REFERENCE 1

Westinghouse Idaho Nuclear Company, Inc.

PJH-18-85

From: P. J. Hult
Phone: 6-3413
Date: July 16, 1985
Subject: PCB/Radioactive Contamination Cleanup in CPP-718

To: W. P. Palica, Project Engineer
Line Item Projects

cc: R. J. Bliss
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R. F. Graefe
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H. U. Johansen
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W. C. Mallory
R. J. Marcinko
T. M. Nash
T. F. Pointer
D. J. Poland
F. K. Wrigley
D. L. York

The attached approved guidelines have been prepared to direct the cleanup of PCB/radioactive contaminated areas on the transformer concrete pad in CPP-718.

If you have any questions, please call me at 6-3413.

P. J. Hult, Field Coordinator
UREP SS Phase II Project

/ls

PROCEDURE FOR REMOVAL OF RADIOACTIVE CONTAMINATION AREAS FROM CONCRETE PAD

A task of the UREP Substation Phase II Project is the removal and disposal of a concrete transformer pad. During a recent radiation survey of the pad, two radioactive contaminated areas were found. These radioactive contaminated areas must be cleaned up prior to disposal of the pad. However, since the pad is also PCB contaminated, cleanup guidelines for both radioactive and PCB contamination must be followed.

I. CLEANUP GUIDELINES

A. Health and Safety

Human exposure to polychlorinated biphenyls (PCBs) will be minimized to protect the health and safety of workers involved in the cleanup activities. Cleanup personnel will be required to obtain a Construction Safe Work Permit for each shift. This permit will be approved by Industrial Safety and will include the necessary protective requirements. WINCO will provide the necessary protective clothing, eye protection, and respirators.

A training session (estimated / hr. long) will be required of all personnel involved in the removal of the radioactive/PCB contaminated material. This training will cover general health and safety hazards associated with PCB contaminates and the appropriate safeguards and work practices to be followed. This training will be coordinated through the WINCO Production Training Section.

1. Protective Clothing

Protective clothing that is impervious to PCBs will be worn in situations where workers may come into contact with PCBs or PCB contaminated materials. This clothing consists of impervious paper-like coveralls (Saranex Tyvek-laminated coveralls), plastic overshoes, and rubber-like gloves (Viton).

2. Eye Protection

Safety glasses with side shields will be worn during any operation in which solid PCBs are present. If liquids or solids containing PCBs contact the eyes, the eyes shall be irrigated immediately with large quantities of water and then be examined by a physician or other responsible medical personnel. Portable eyewash units will be located at the cleanup site (by others).

3. Respiratory Protection

It has been determined by Industrial Safety that respiratory protection is required for this cleanup activity. The recommended respirator is a full-face respirator with an acid/gas/organic vapor cartridge with a high-efficiency prefilter.

B. General Health and Safety

1. Facilities for shower baths will be provided for workers exposed to PCBs. After working with PCBs, workers will shower before changing into street clothing.

2. Workers exposed to PCBs will be advised to wash their hands and exposed skin before eating, drinking, smoking, or using toilet facilities.

3. Food, drink, or smoking materials will not be permitted in areas where PCBs are handled.

4. To reduce injuries, hard hats will be worn and safe work practices will be followed.

5. Ear plugs or ear muffs will be used when utilizing the electric tools.

II. CLEANUP ACTIVITY MONITORING

A. N&IS personnel shall monitor the cleanup activities to assure compliance with the health and safety regulations for PCB contamination cleanup.

B. HP personnel shall monitor the cleanup activities to assure complete cleanup of the radioactive areas and prevent the spread of contamination.

III. CLEANUP PROCEDURE

A. An HP shall clearly mark the boundaries of the radioactive contaminated area.

B. Workmen shall attempt to remove the contaminated areas using a hammer and chisel. Caution shall be used to prevent the spread of concrete chips and contamination.

C. If contaminated areas cannot be removed by the above method, workmen shall proceed as follows:

1. A barrier of approximate size 5' X 5' with 3' walls made of fire-proof wood and plastic sheeting shall be built in a non-contaminated area. Workmen shall install barrier around the contaminated area being worked on.

2. Workmen shall use an electric die grinder to cut the concrete around the radioactive contaminated area to a depth of approximately 1/4 inch. During grinding a vacuum with a HEPA filter (to be supplied by others) shall be held near the cutting disc to pick up the concrete dust.

3. Workmen shall use a hammer and chisel to remove the concrete within the cut area. Again the vacuum will be held near the cutting tool to immediately pick up any concrete dust or chips.

4. When both radioactive contaminated areas have been cleaned up, the barrier shall be removed and disposed of as directed by N&IS and HP personnel.

5. Tools used in the cleanup activities shall be thoroughly wiped with rags soaked in diesel fuel.

It shall be the responsibility of the N&IS and HP personnel to determine the final disposal method of the barrier, vacuum contents, rags, tools, clothing, and any other materials used in the cleanup activities. Items containing only PCB-contamination shall be placed in a container for disposal with other PCB contaminated materials to be removed from this area at a later date. Items with mixed contamination shall be placed in a separate container for disposal with materials of mixed contamination to be removed from this area at a later date.

REFERENCE 2

ATTACHMENT A

SCOPE OF WORK

FOR

REMOVAL OF PCB CONTAMINATED MATERIAL

LOCATED AT

THE IDAHO CHEMICAL PROCESSING PLANT

IDAHO NATIONAL ENGINEERING LABORATORY

1. Drain oil (179 PPM PCB) from Transformer XFR-8T2-2 located in the Main Substation (CPP-718) of the Idaho Chemical Processing Plant (ICPP). Estimated quantity 4750 gallons, approximately 37,100 lbs.

2. Transport the transformer oil to the Disposal Site.

3. Dispose of the transformer oil.

4. Prepare XFR-8T2-2 body for shipping (dimensions 185 in. x 126 in. x 191 in. high, approximately 53,000 lb.).

5. Load XFR-8T2-2 body from concrete pad to truck.

6. Ship XFR-8T-2 body to Disposal Facility.

7. Unload XFR-8T2-2 body at the Disposal Facility.

8. Dispose of XFR-8T2-2 body.

9. Remove PCB contaminated portion of transformer pad (concrete and rebar) that XFR-8T2-2 is sitting on.

10. Remove PCB contaminated gravel and dirt in the yard area in the vicinity of XFR-8T2-2 pad.

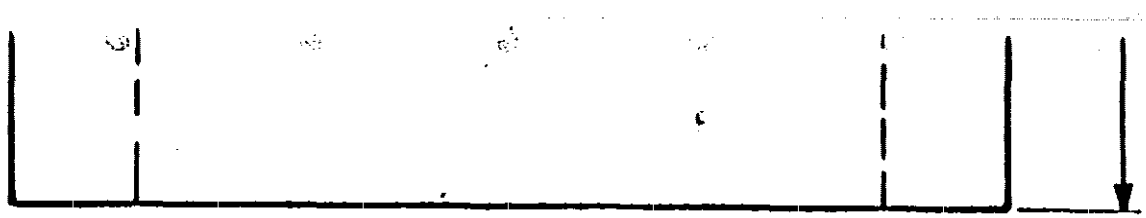
11. Remove PCB contaminated transformer accessories, clothing, and debris.

12. Provide PCB sampling and analysis in support of the above Items 1 and 10 through 12.

13. Transport PCB contaminated solids (dirt, gravel, concrete, rebar, debris, etc.) to the Disposal Facility.

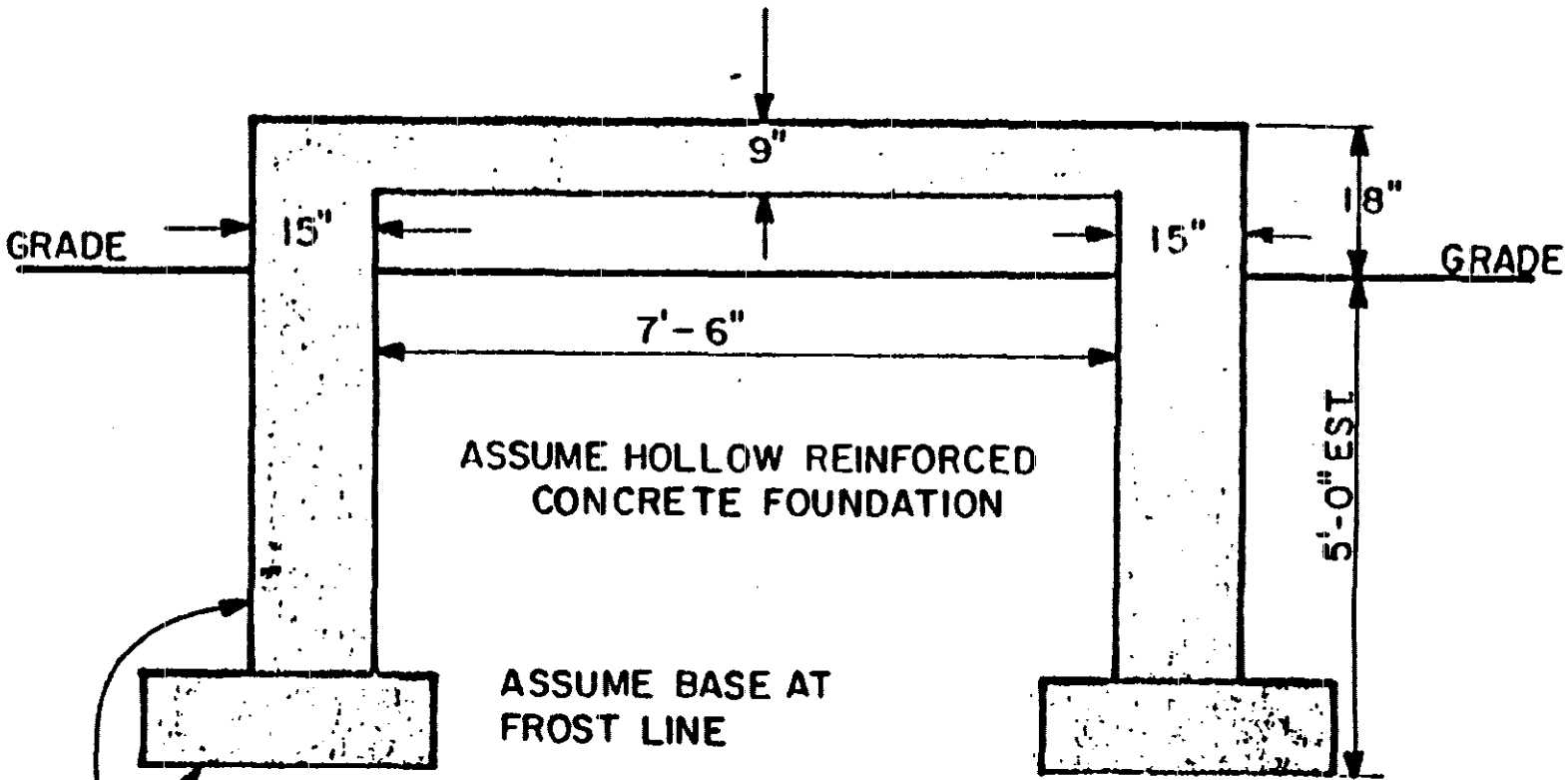
14. Dispose of the PCB contaminated solids.

19



EXISTING TRANSFORMER BASE PLAN

SCALE: 1/2" = 1'-0"



OUNDATION & STEM
/ALL CONFIGURATION
S ASSUMED

EXISTING TRANSFORMER BASE ELEVATION

SCALE: 1/2" = 1'-0"

SKETCH NO. 1

00138?

REFERENCE 3

Avon, draft Summary (2)

I. General Information

The Idaho Chemical Processing Plant (ICPP) is located at the Idaho National Engineering Laboratory (INEL), 42 miles west of Idaho Falls and approximately three miles north of the Central Facilities Area. In 1981, a Utilities Replacement and Expansion Project (UREP) to upgrade the two primary transformer at ICPP's, CPP-718 transformer yard was initiated. Just prior to the summer of 1982, one of the 2400 V transformers was removed in preparation for the installation of a new, larger 13,800 V transformer. The entire load was placed on the one remaining transformer which was forced to operate with a 30-40% overload. As a result of this overloa oil expansion created an intermittan leak from one of the secondary bushings. The leak was present only during the summer months and the only when the transformer was maximized.

Temporary measures to contain the leak, until a new transformer could be installed, involved collecting

, a drip pan and the foreign
the oil in 55-gallon drums. An
estimated 400 gallons of fluid,
containing 179 ppm of polychlorinated
biphenyls (PCB's), leaked from the
transformer during this time. The
transformer was drained and out
of service on December 22, 1984. The
transformer yard was secured and
cleanup activities, of the concrete pad
and surrounding soil, were then
initiated. The 15 ft x 11 ft x 16 ft high
transformer was removed and taken
to a T/S/D facility on April 2, 1985.

II. Description of Spill Site

The leak from transformer
XFR-8T2-2 occurred at the transformer
yard adjacent to the main substation
of the ICPP ( ). The 14,000 sq. ft.
yard is surrounded by an 8 ft high
cyclone fence. A grounding grid is
located 18-24 inches below the
surface of the soil. The soil is an
alluvial deposit of sand, silt and
gravel with increasing gravel
content with depth. A 3-4 inch
layer of gravel lies on top of the soil

The 10 ft x 8 ft x 6 ft 8 inch high transformer pad was constructed of ~~hollow~~ reinforced concrete. (Figure

As a safety precaution, before the extent of the spill could be delineated, a health physicist surveyed the surface soil and concrete pad for radioactivity. Nine contaminated soil areas, above a 200 cpm background, ranging from 400 to 2500 cpm were identified. The location of these areas is shown on figure . In addition, two radioactive areas were found on the concrete pad with and . In order to avoid handling mixed ~~radioactive and PCB contaminated~~ waste, the radioactive contaminated soil and concrete (radioactive) were removed from the transformer yard. (Appendix A)

The guidelines that were developed for the cleanup of the radioactive contaminated areas are in Appendix B. The guidelines outline the health and safety procedures that were followed to protect cleanup personnel from exposure to PCB's and radioacti

Nuclear and industrial safety (NIS and health physics (HP) personnel were present to monitor the cleanup activities and prevent the spread of contamination.

To determine the lateral extent of the PCB contamination, a sampling design consisting of a hexagonal grid based on equilateral triangles was used. This grid design is suggested by the EPA for sampling PCB spill sites with a circular area of contamination (reference). Figure gives details of the grid design. Figure shows the areas of the transformer yard that were sampled.

Surface samples were taken with a hand auger. In each case, the surface of the soil beneath the overlying gravel was sampled and examined for oil. If little or no oil was detectable, the auger was used to dig down to the uppermost oil containing layer. In all cases, oil was detected within the top 8 inches of soil.

To determine the vertical extent of the contamination, one hole 2-3 ft from the east side of the concrete pa was drilled down to 12 ft and samples taken every 1½ ft. A seco hole, also 2-3 ft from the concrete pad was drilled down to 17 ft. Drilling was terminated at 17 ft w

a cobble layer was encountered, causing the successive shearing of two bolts in the augers.

Now report on Sue's results, put in table of results Then make end with sentence to the effect of

The highest level of PCB Contamination was 20ppm at the soil surface on the east side of the transformer pad.

III. Cleanup Process

To prevent unauthorized access to the spill area, the fence surrounding the transformer yard was locked. To prevent the inadvertant spreading of the contamination beyond the boundaries of the spill, plastic sheeting was placed over the concrete pad and surrounding contaminated soil. To eliminate exposure to the area the transformer pad and adjacent areas of contamination were partitioned with rope and pos

During this time, guidelines for the cleanup of the area were developed A copy of the cleanup plan is in Appendix . The EPA region X Office in Seattle was notified of the spill and approved of the ~~cleanup~~ plan ~~The plan~~ which called for the removal of any PCB contaminated soil with a concentration greater than 10 ppm

Has EPA really contacted about our guidelines

Workers handling any contaminated materials were trained in the safety hazards associated with PCB contaminate

and the appropriate safeguards and work practices to be followed. Protective clothing, ~~the~~ safety glasses and full-face respirat were used by the workers. when work in the excav

Priest Electric Co was subcontracted to remove the contaminated soil. Hand shovels were used to remove the top 6 inch of gravel and soil on the east side of the transformer pad. The soil was placed in double-lined DOT approv barrels and labelled as ~~regulated waste~~ ~~toxic~~ ~~toxic~~ and radioactive waste PCB waste

The top 6 inches of gravel and soil remaining three sides of the transformer pad was removed and stockpiled for use as backfi

The soil on the east side of the concrete pad between 6 inches an 18 inches deep was placed in 55-ga drums and labelled as PCB ~~toxic~~ waste ~~material~~. ~~Chem-Security~~ U.S. Pollution, Inc. w contracted to dispose of this waste

The soil below 18 inches was removed with a backhoe in 1 ft increments. These lifts were segregated and then sampled by NUS personnel.

After analysis, each lift was disposed of in accordance with EPA Region 10 guidelines. Soil containing less than 10 ppm PCB was backfilled. Soil with a PCB concentration greater than 10 ppm was removed and disposed of off-site. All soil below 6 inches deep on the north, south and west sides of the transformer pad contained no significant PCB concentrations. This soil was considered clean and used as backfill.

The concrete transformer pad was removed intact and transported and disposed of by U.S. Pollution Control Inc. on Dec. 13, 1985. All contaminated materials generated as a result of the cleanup, i.e. the backhoe, shovels, rags, clothing, and equipment were either decontaminated with a cleaning agent or were placed in containers and sent to a staging area south of ICPP to wait disposal as PCB waste.

IV. Sampling and Analysis

The sampling and analytical techniques are summarized in the Cleanup Plan in Appendix

for the removal of any PCB contaminated oil greater than 10 ppb. ~~The plan also outlines the safety precautions to prevent worker exposure etc.~~ To prevent worker exposure

- summarize activities to date
- worker exposure

- cleanup of contaminated materials

The PCB contaminated transformer was drained of its estimated 4750 gallons of oil. This oil was put into 55 gallon drums and transported to US Pollution, a TSD facility ~~for~~ for its final disposal. The transformer body was prepared for shipment by ~~—~~ ~~was transformer cleaned~~

EPA-001

REFERENCE 4

PCB-CONTAMINATED SOIL FROM LEAKING TRANSFORMER XFR-8T2-2

On April 2, 1985, transformer XFR-8T2-2 was disconnected and removed from UREP Substation II near CPP-613. This transformer had a capacity of approximately 4750 gal and had been leaking for at least 2 years before its removal. It has been estimated that at least 400 gal of transformer fluid, containing 179 ppm PCBs (polychlorinated biphenyls), leaked from the transformer during this time. The leak caused an obvious oil spill in the surficial gravel on the east side of the concrete pad on which the transformer had been located.

Because of federal regulations (CERCLA, TSCA, and DOE orders), it is necessary that all such PCB-contaminated soil be excavated and transferred to a licensed storage facility. As a precaution, the area within the fenced portion of the substation yard was surveyed for radioactivity. In addition to the normal background (200 cpm), nine "hot spots" were found, ranging from 400 to 2500 cpm (see Figure 1).

In order to try to delineate the extent of the spill, a small 7.5-hp auger was brought in along with hand augers. In designing the sampling plan, care was taken to avoid the radioactive spots since the laboratory certified to analyze PCBs cannot accept mixed waste. Care was also taken to avoid the grounding grid located 18-24 in. below the surface (Figure 2).

Using the power auger, one hole was drilled to a depth of 2 ft (Figure 3) and sampled every foot. A second hole was drilled about 2-3 ft from the spill, and samples were taken every 1 1/2 ft (Figure 3). Evidence of oil was observed down to about 12 ft, where drilling was stopped. To ensure that the sampling procedure was not mixing oil-contaminated soil with uncontaminated material at greater depths, a second hole, located approximately 2 ft from the 12-ft hole at about the same distance from the spill (Figure 3), was drilled down to about 10 1/2 ft, where a sample was taken. The next sample taken was at 15 ft. Visual examination and smell indicated that both of these samples also contained oil. Drilling of the hole was terminated when a cobble layer was encountered at 17 ft, causing the successive shearing of two bolts in the auger.

Since the vertical extent of the oil contaminant could not be determined with the equipment at hand, an attempt was made to delineate its lateral extent. Therefore, a number of samples were taken with a hand auger at various distances and directions from the spill (Figure 3). In each case, the surface of the soil beneath the overlying gravel was sampled and examined for oil. If little or no oil was detectable, the hand auger was used to drill a hole down to the uppermost oil-containing layer. In all cases examined, oil was detected within the top 8 in. of soil.

Three 6-8-in.-deep holes were also augered and sampled just outside the fence (Figure 3). Only one of these samples (the one just inside the gate) produced evidence of oil; only a slight oily odor was detected in the others. However, it is likely that higher concentrations of oil are present at lower elevations.

The samples are currently undergoing radiological analysis prior to shipment for PCB analysis. Although oily material was found in every hole augered within the fenced area, it has not yet been ascertained whether all of this material is contaminated with PCBs; some of the oil may be from hydraulic fluid, condensers, etc. In addition, the PCB-bearing transformer fluid that leaked from transformer 8T2-2 may have been retained above the frost line in winter, mixed with other oils and fluids, and spread throughout the entire substation and adjacent areas. Therefore, further evaluation of the extent of PCB contamination in the area awaits the completion of the PCB analyses.

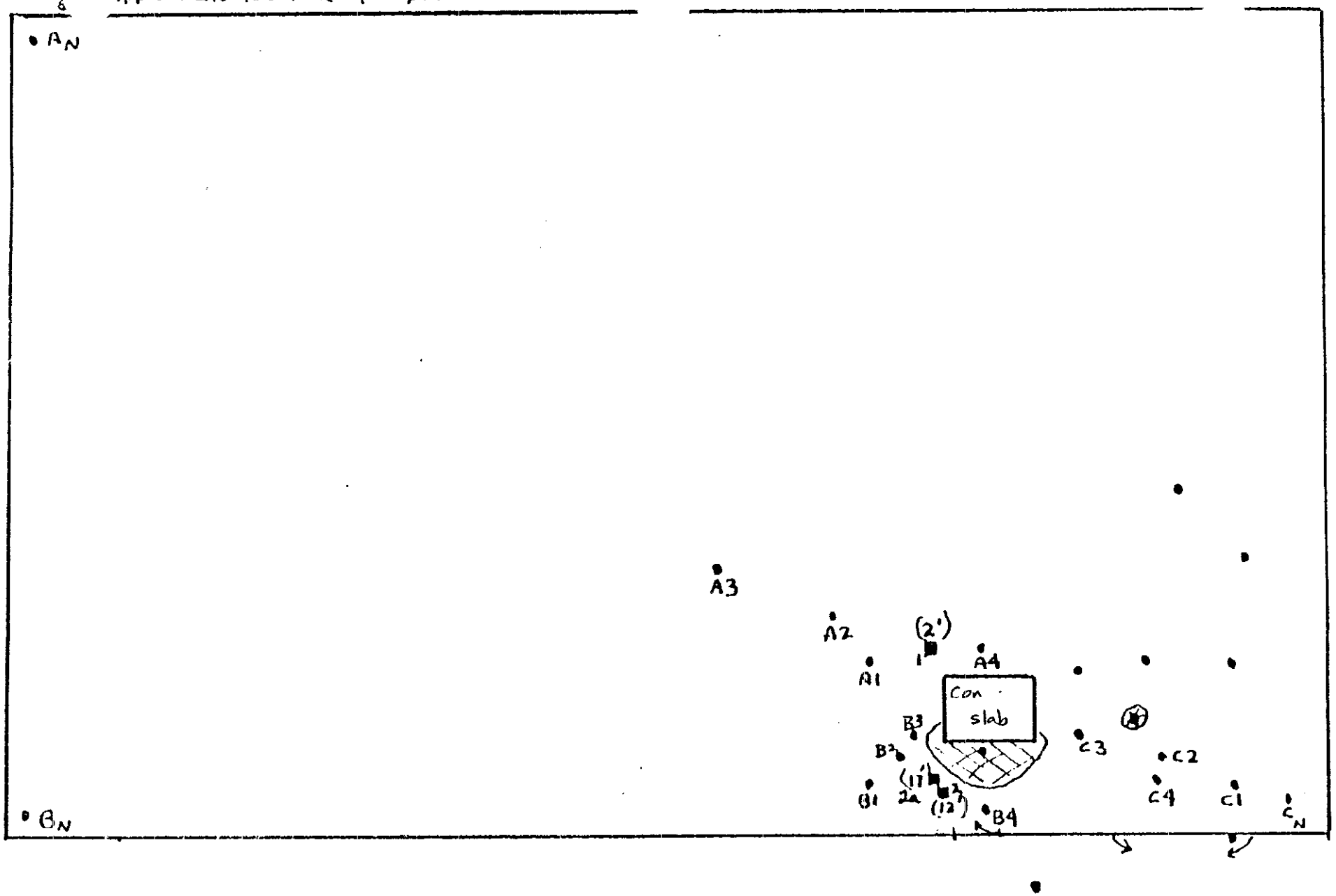
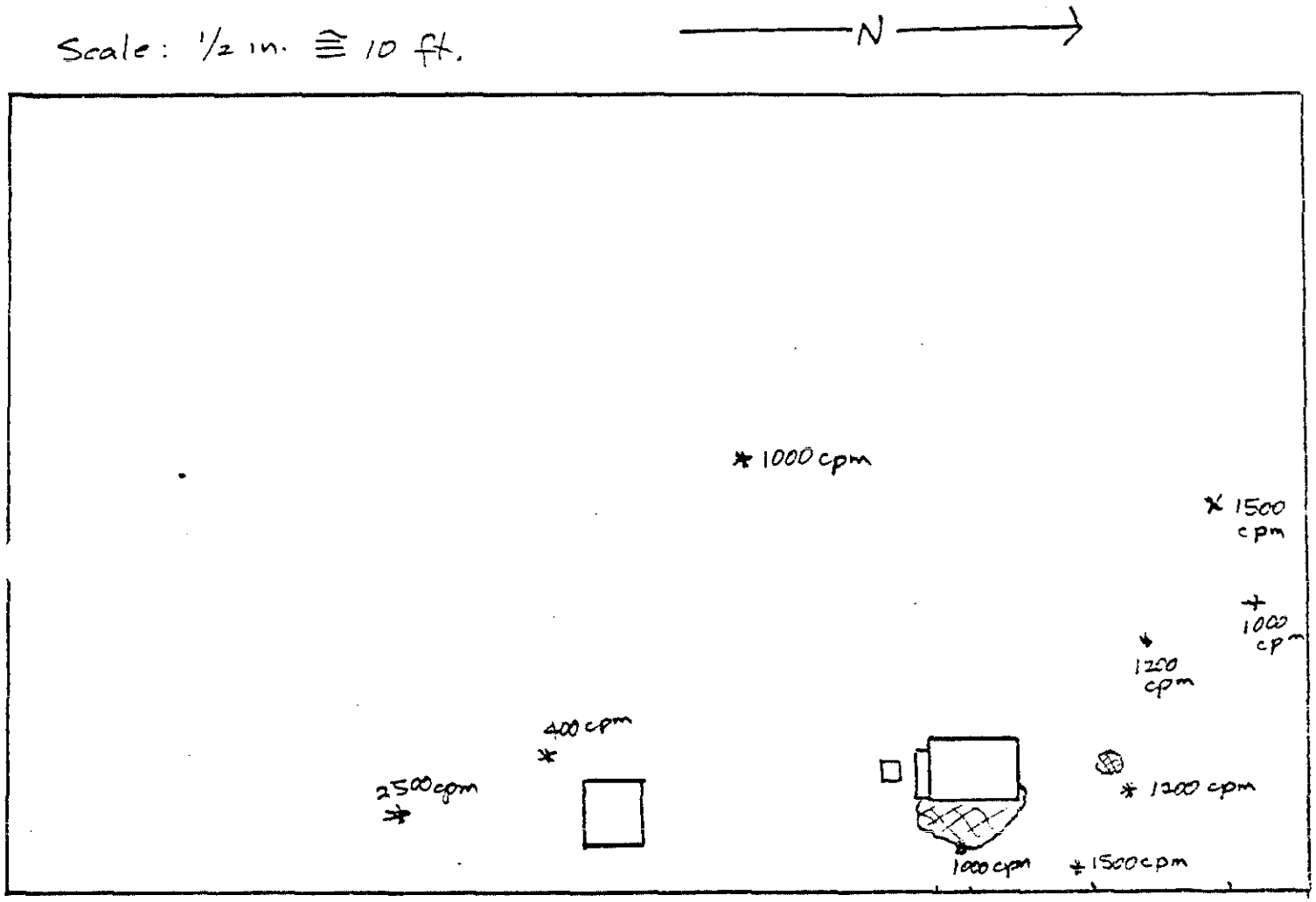


Figure 3.-- Approximate locations of samples taken in and near URGP Substation II.

Scale: 1/2 in. ≅ 10 ft.



* Approximate location of "hot" spots

Oil detected on surface of gravel layer

Figure 1.-- Approximate Location of Localized Radioactive Material at URDP Substation II.

A: Transformer XFR-8T2-2 disconnected and removed during 77--

B: Existing transformer XFR-8T2-3

C: Existing relocated transformer XFR-8T2-1

D: Manhole

E: Outdoor circuit breaker

Scale: 1/2 in. ≅ 10 ft.

N

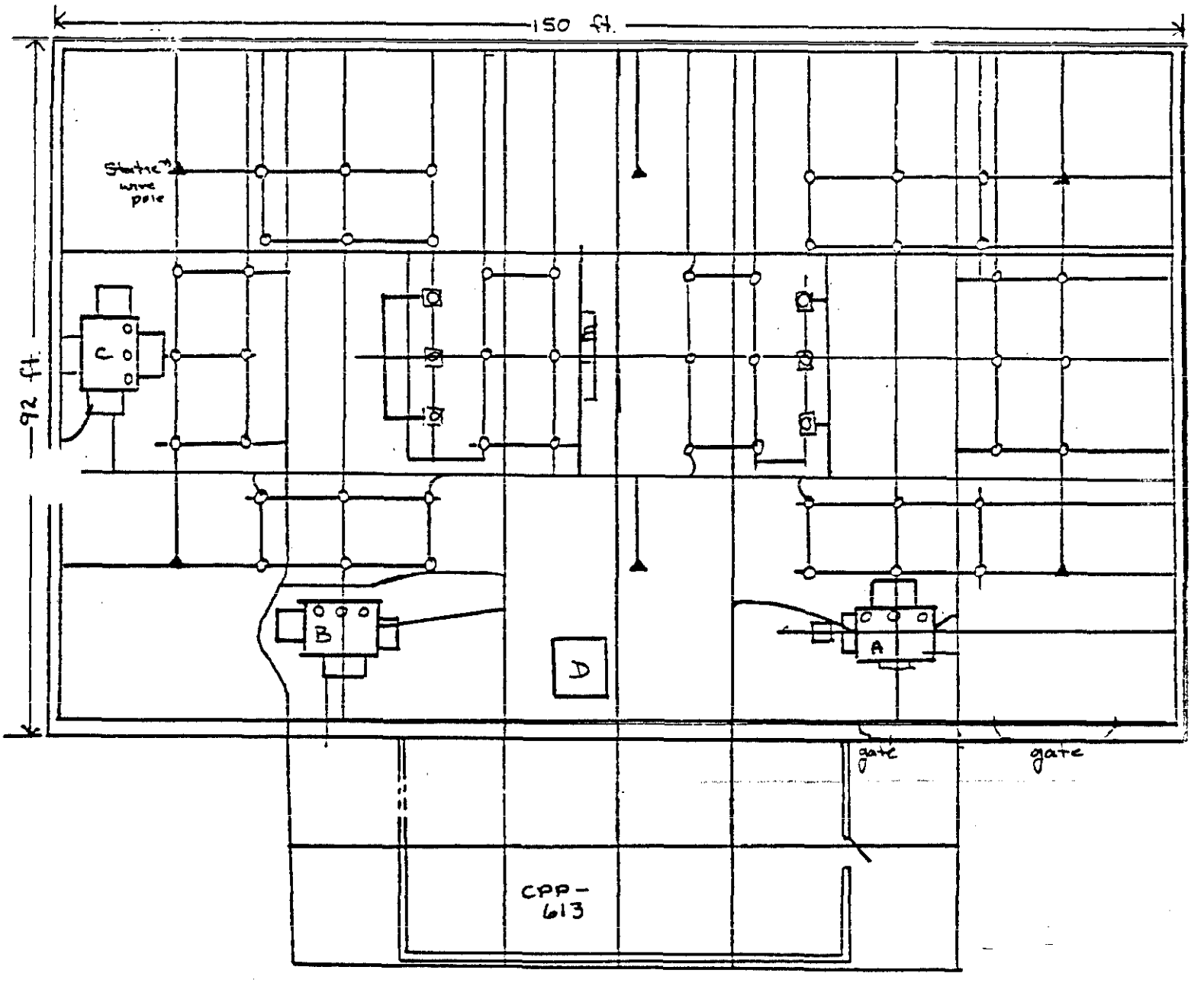


Figure 2.--Grounding Grid at CPP-613, UREP Substation II.

REFERENCE 5

001371

FINAL REPORT FOR 613 CLEANUP

REPORT FOR : D J POLAND
ADDRESS : CPP 630
LOG NUMBER : 071710
PHONE NUMBER : 6-3650

DATE RECEIVED : 07/17/85
TIME RECIEVED : 13:10
DATE COMPLETED: 09/17/85
TIME COMPLETED: 13:43

GWA CHARGED : 14320-530-450
REVIEWED BY : D.R. TRAMMELL

MSA MR/HR : COLD
SIGNATURE: David Trammell

HAZARD INDEX: ZERO

COMMENTS:

SAMPLES RETURNED TO JOAN POLLAND 08/29/85

ANALYSIS	METHOD	SAMPLE	ANALYST	RESULTS FOR 071710
PCB	9171	SURPCB 7	LWW	0.8 UG/GRAM
PCB	9171	SURPCB 12	LWW	1.1 UG/GRAM
PCB	9171	SURPCB 11	LWW	< 0.5 UG/GRAM
PCB	9171	SURPCB 9	LWW	9 UG/GRAM
PCB	9171	SURPCB 4	LWW	31 UG/GRAM ←
PCB	9171	18-PCB#10	LWW	< 0.5 UG/GRAM
PCB	9171	18-PCB#15	LWW	< 0.5 UG/GRAM
PCB	9171	18-PCB#14	LWW	< 0.5 UG/GRAM
PCB	9171	SUR-PCB-17	LLW	< 0.5 UG/GRAM
PCB	9171	SUR-PCB-18	LLW	< 0.5 UG/GRAM
PCB	9171	SUR-PCB-19	LWW	< 0.5 UG/GRAM
PCB	9171	30-PCB #5	LLW	1 UG/GRAM
PCB	9171	30-PCB #11	LWW	0.5 UG/GRAM
PCB	9171	42-PCB-8	LWW	4.2 UG/GRAM
PCB	9171	42-PCB-9	LWW	0.7 UG/GRAM
PCB	9171	54-PCB-6	LWW	3.3 UG/GRAM
PCB	9171	66-PCB#6	LWW	2.9 UG/GRAM
PCB	9171	72-PCB#20	LWW	5.2 UG/GRAM
PCB	9171	54-PCB-1	LWW	<0.5 UG/GRAM
PCB	9171	66-PCB-1	LWW	<0.5UG/GRAM
PCB	9171	54-PCB-4	LWW	0.7 UG/GRAM
PCB	9171	66-PCB-4	LWW	<0.5 UG/GRAM
PCB	9171	54-PCB-3	LWW	<0.5 UG/GRAM

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ANAL	S	METHOD	SAMPLE	ANALYST		RESULTS FOR 071710
PCB		9171	66-PCB-3	LWW	14	0.9 UG/GRAM
PCB		9171	18-PCB-2	LWW		<0.5 UG/GRAM
PCB		9171	30-PCB-7	LWW		<0.5 UG/GRAM
PCB		9171	24-PCB-16	LWW	15	2.5 UG/GRAM
PCB		9171	78-PCB-20	LWW	16	4.0 UG/GRAM
PCB		9171	72-PCB#20R	LWW	17	5.0 UG/GRAM
PCB		9171	72-PCB#20R	LWW	18	5.4 UG/GRAM

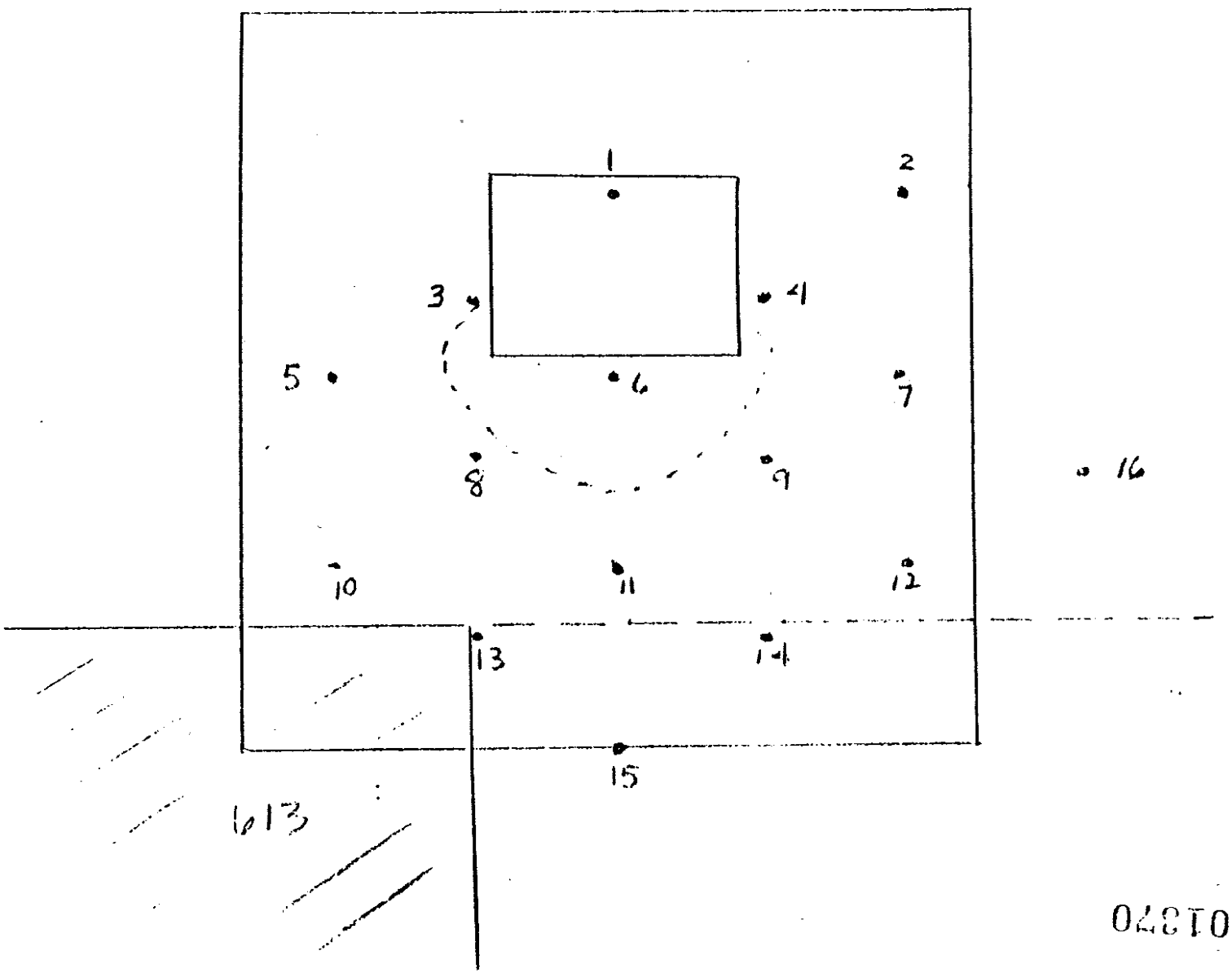
001371

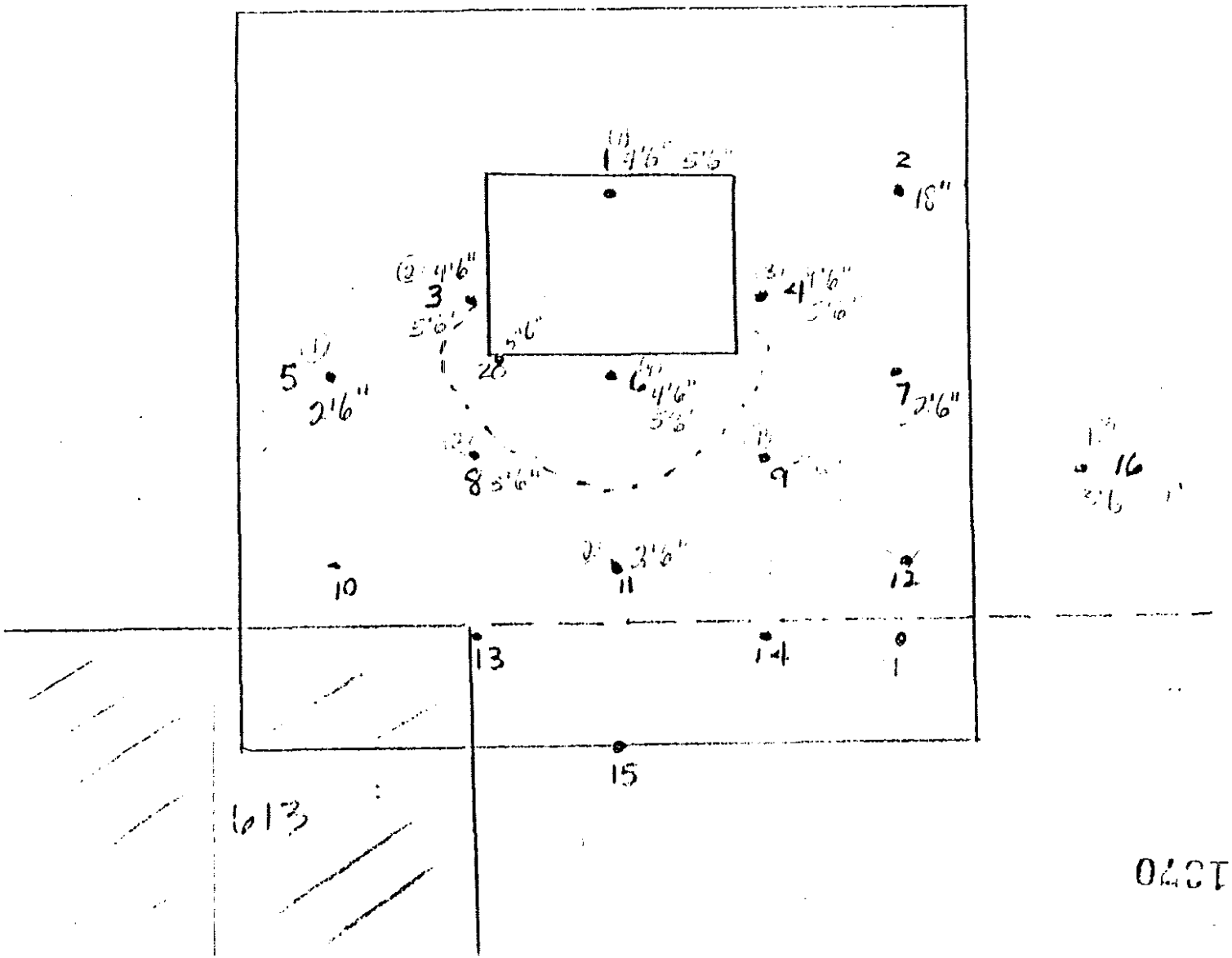
REFERENCE 6

001370

Sample No.	Coordinates re NW Corner of CPP-613		
1	6'N	16'8"W	[illegible]
2	14'N	16'8"W	
3	2'N	12'6"W	
4	10'N	12'6"W	+ Sur.
5	2' ~~N~~ S	9'2"W	7'6"
6	6'N	9'2"W	7'[illegible]
7	14'N	9'2"W	
8	2'N	5'10"W	
9	10'N	5'10"W	[illegible] 3'
10	2' ~~N~~ S	~~1'8"~~ 4' W	12"
11	6'N	1'8"W	
12	14'N	1'8"W	
13	2'N	1'3"E	No Sample
14	10'N	1'3" ~~E~~ W	15"
15	6'N	~~5'10"E~~ 1'W	15"
16	24'10"N	5'5"W	~24"
17	6'N	1'E	Sur.
18	10'N	1'E	Sur.
19	16 N	1'E	Sur
20	2'N	16'W	Footing (CE) ~6' ~6'6"

T[illegible]
#1 5E [illegible]
#2 1E




1
4'6"
5'6"
2
18"
3
4'6"
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4'6"
5'6"
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2'6"
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3'6"
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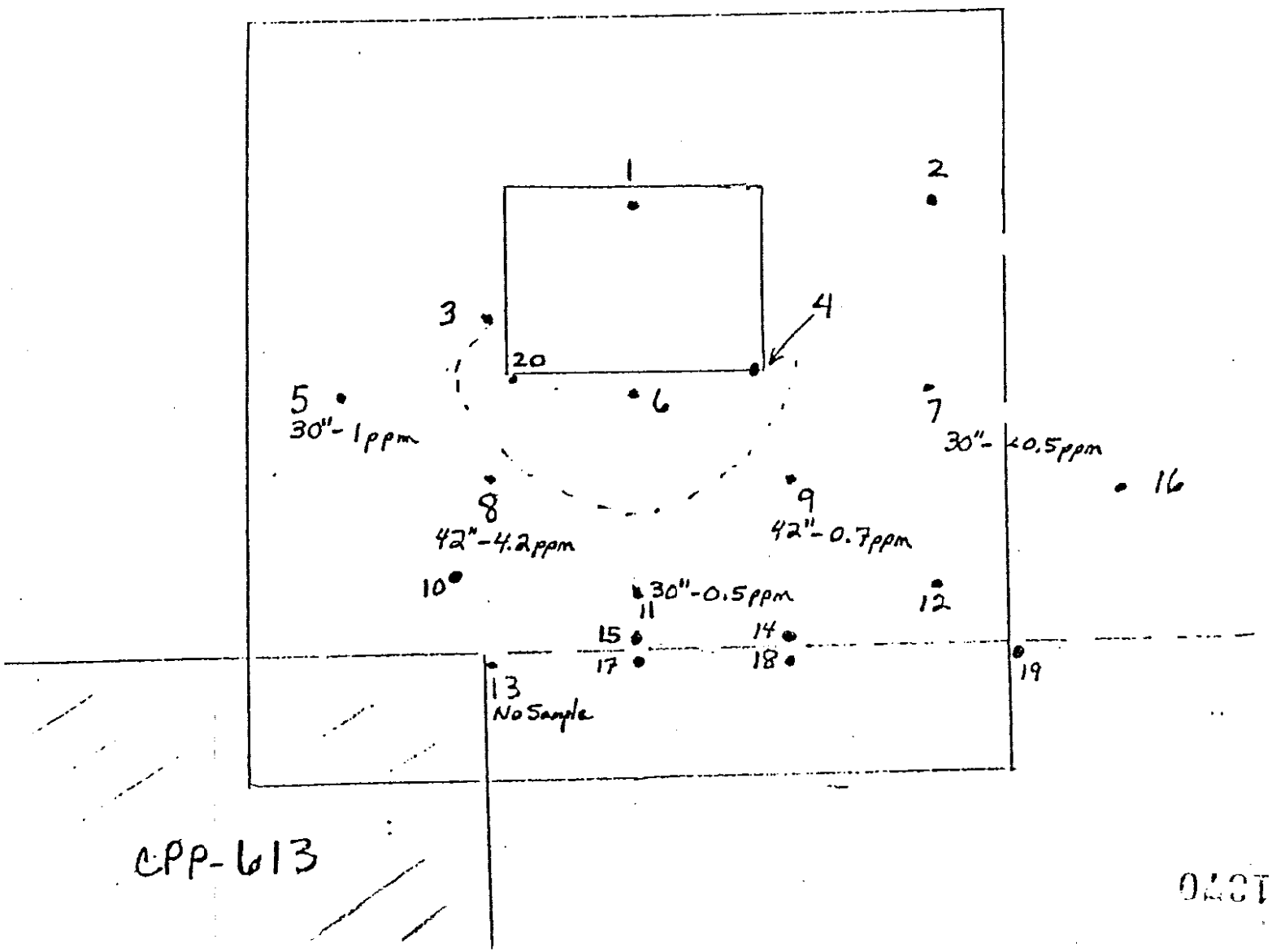
1613

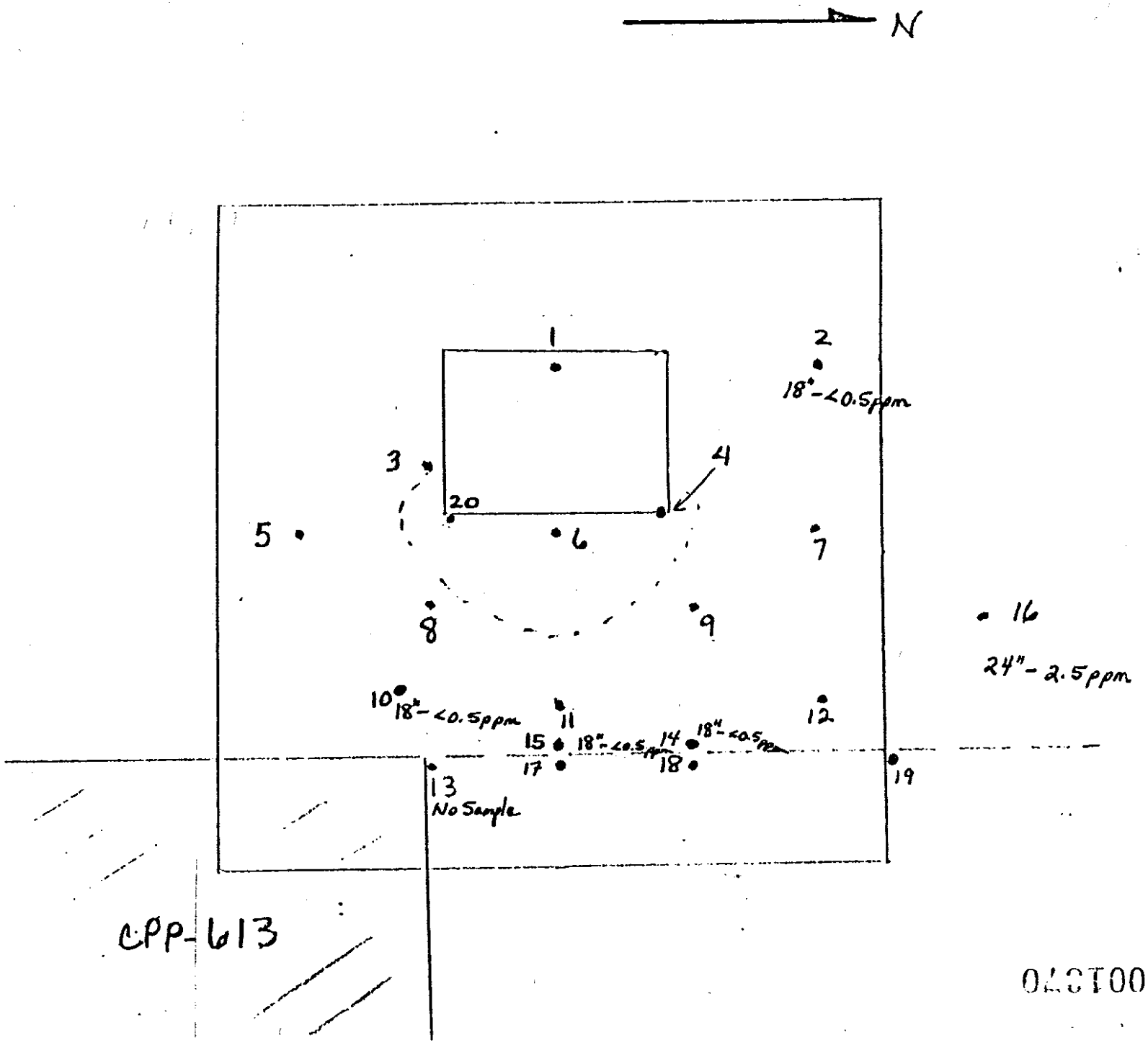
00135?0

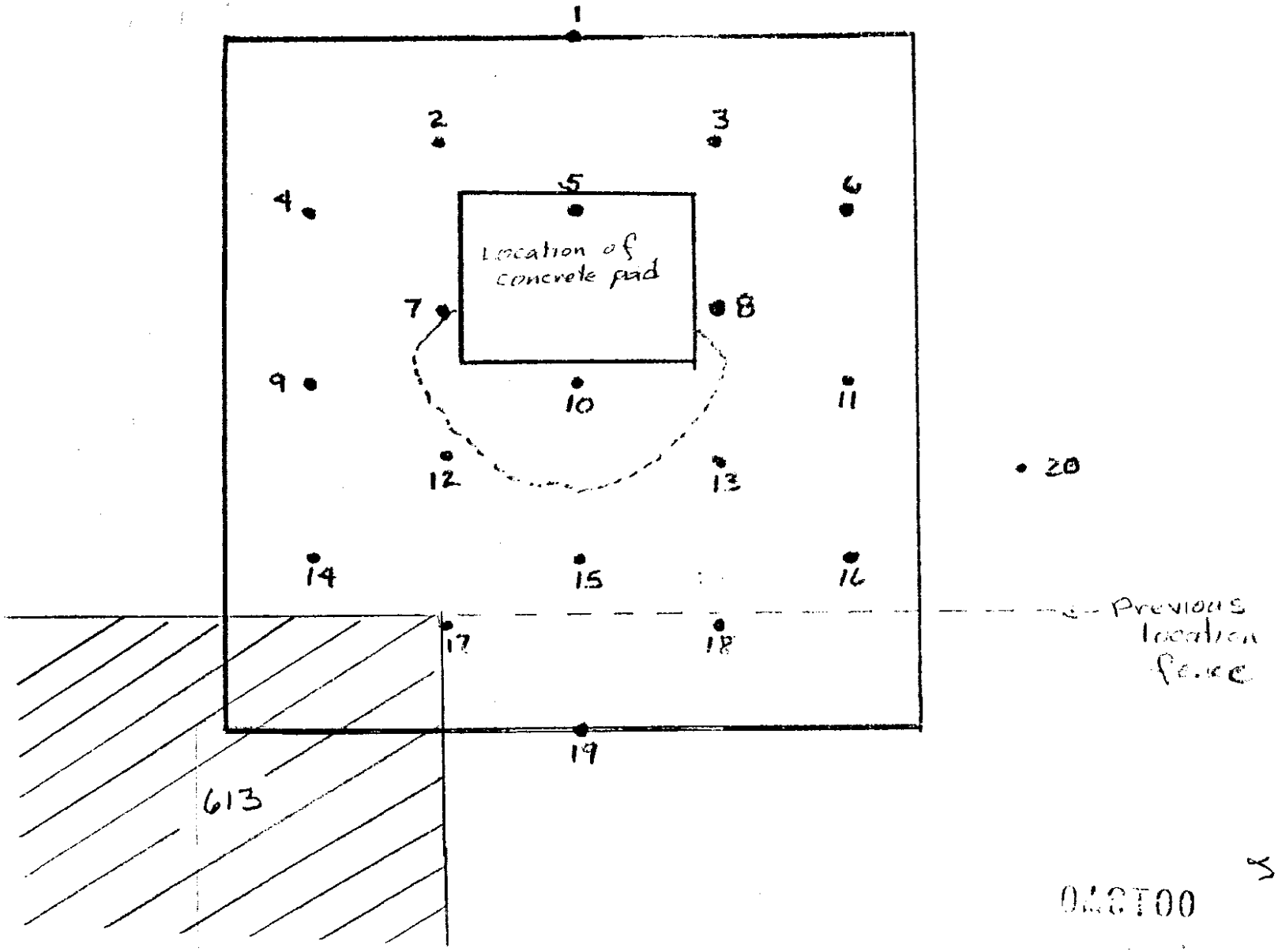
30" and 42" Samples



CPP-613

18" and 24" Samples




1
2
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Location of concrete pad
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Previous location fence
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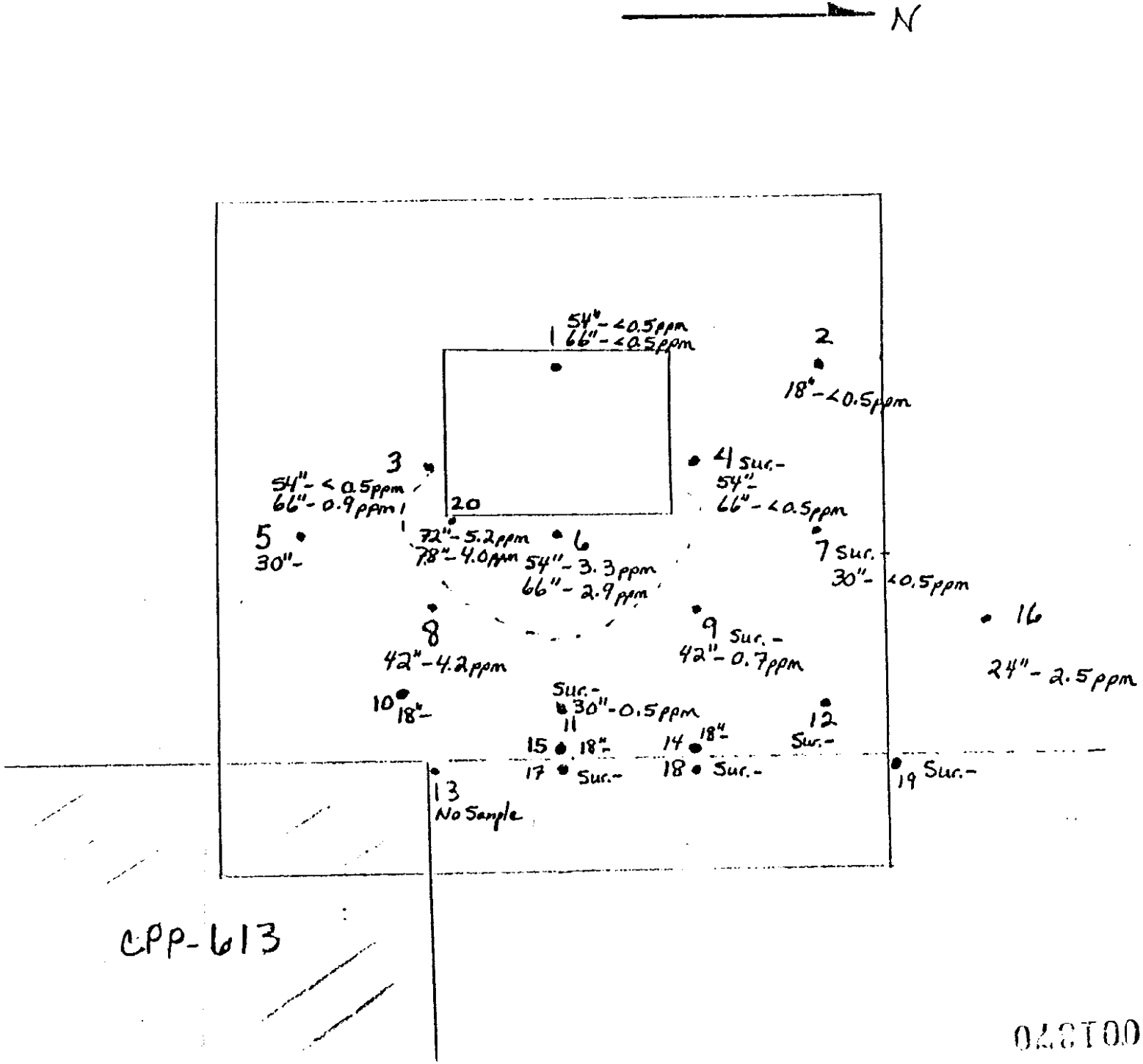
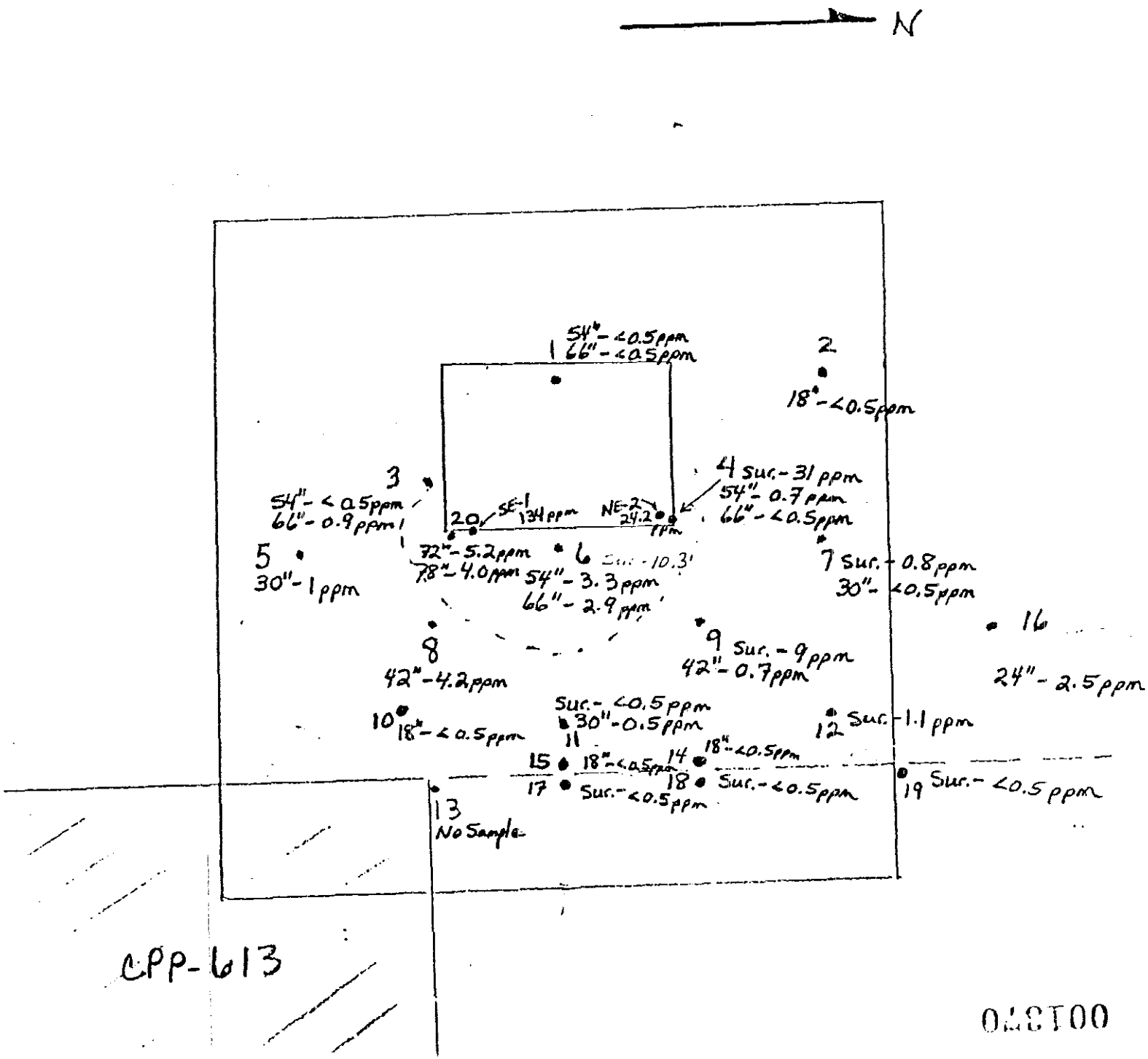
18
19
613

OAGT00


N
1
54" - <0.5ppm
66" - <0.5ppm
2
18" - <0.5ppm
3
54" - <0.5ppm
66" - 0.9ppm
4 Sur. -
54" -
66" - <0.5ppm
20
5
30" -
72" - 5.2ppm
78" - 4.0ppm
6
54" - 3.3ppm
66" - 2.9ppm
7 Sur. -
30" - <0.5ppm
8
42" - 4.2ppm
9 Sur. -
42" - 0.7ppm
16
24" - 2.5ppm
10
18" -
Sur. -
30" - 0.5ppm
11
12
Sur. -
15
18" -
14
18" -
17
Sur. -
18
Sur. -
19 Sur. -
13
No Sample
CPP-613

00130

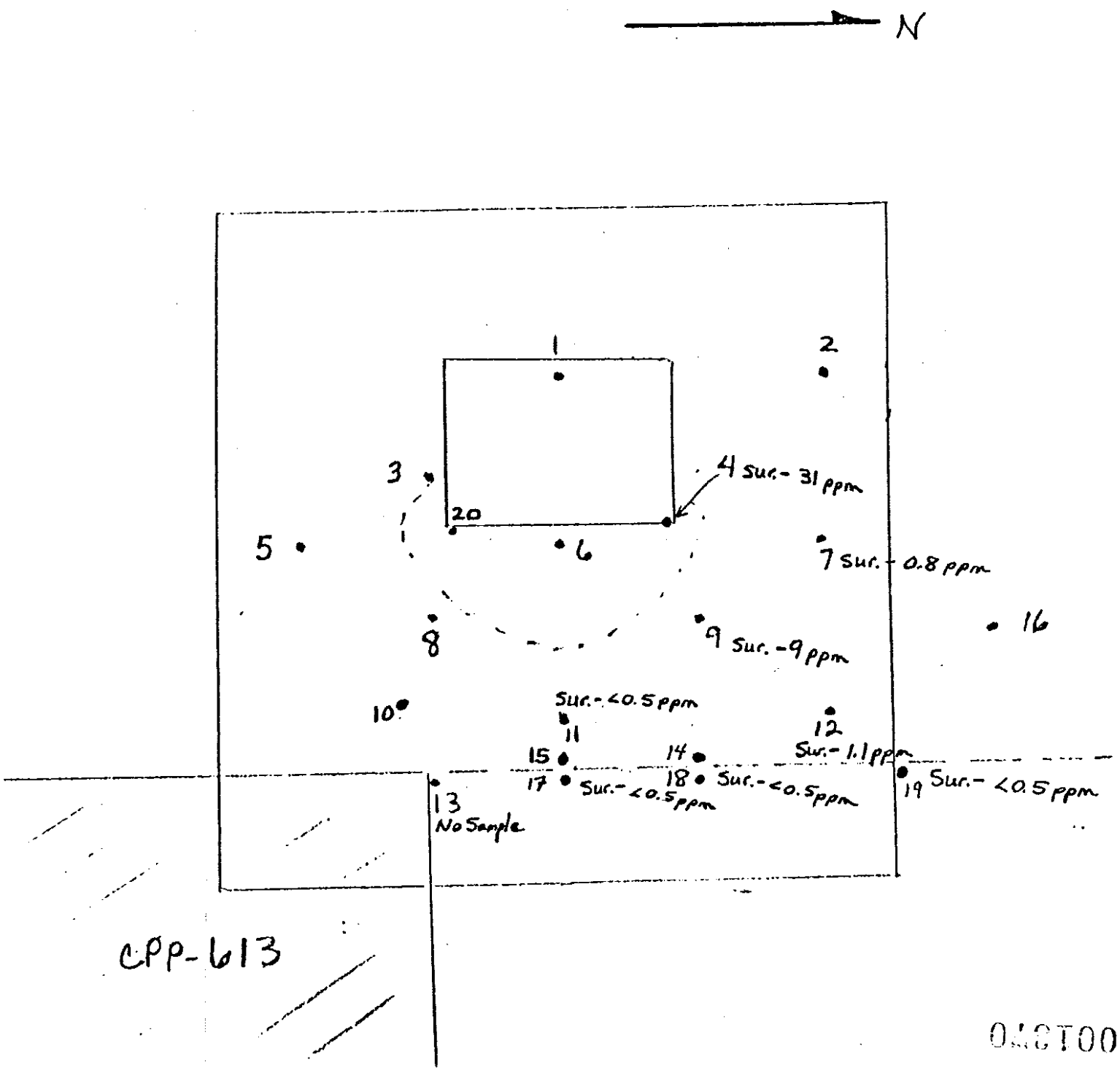
All Samples



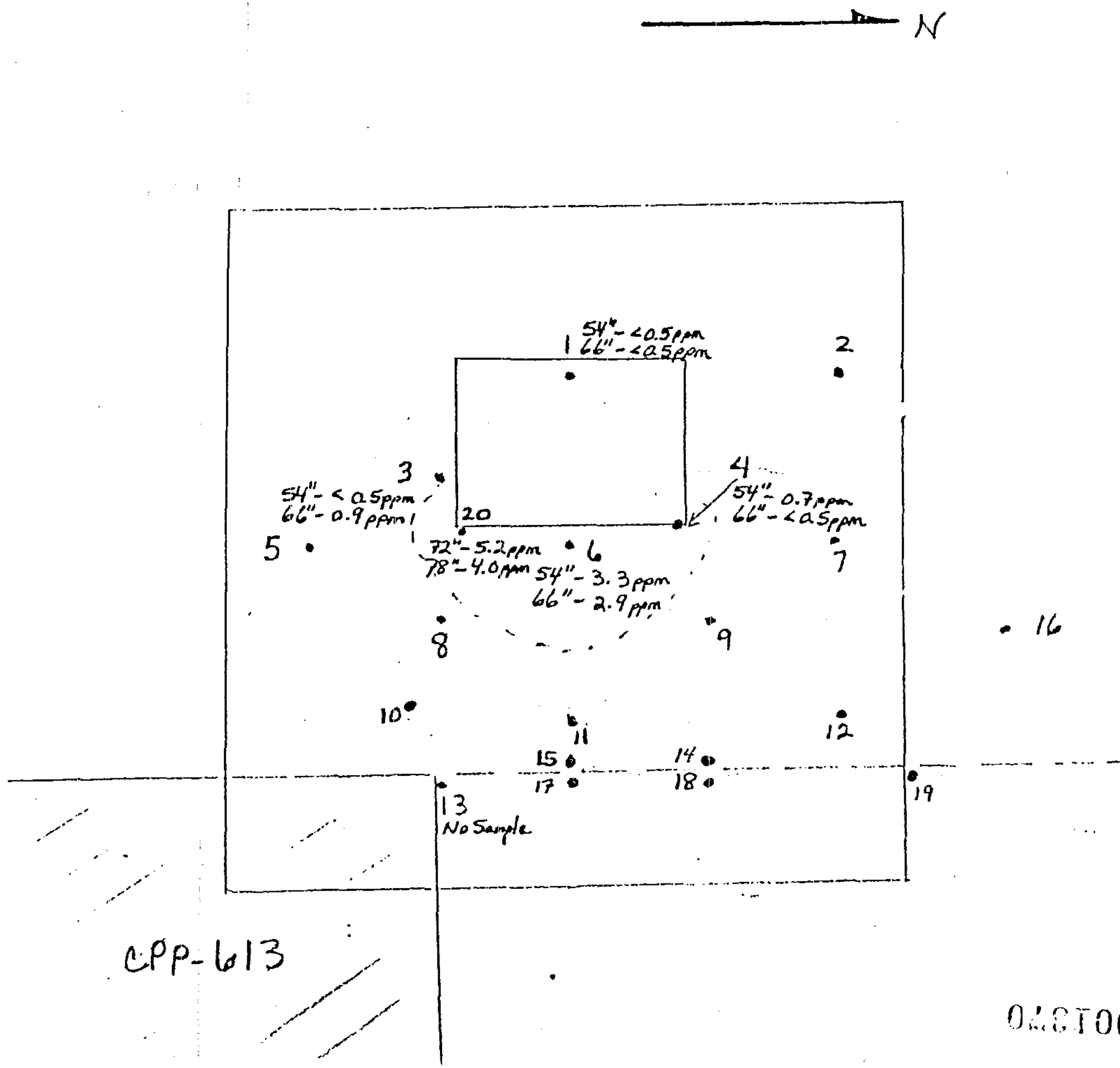
CPP-613

00137O

Surface Samples



54", 66", 72", and 78" Samples



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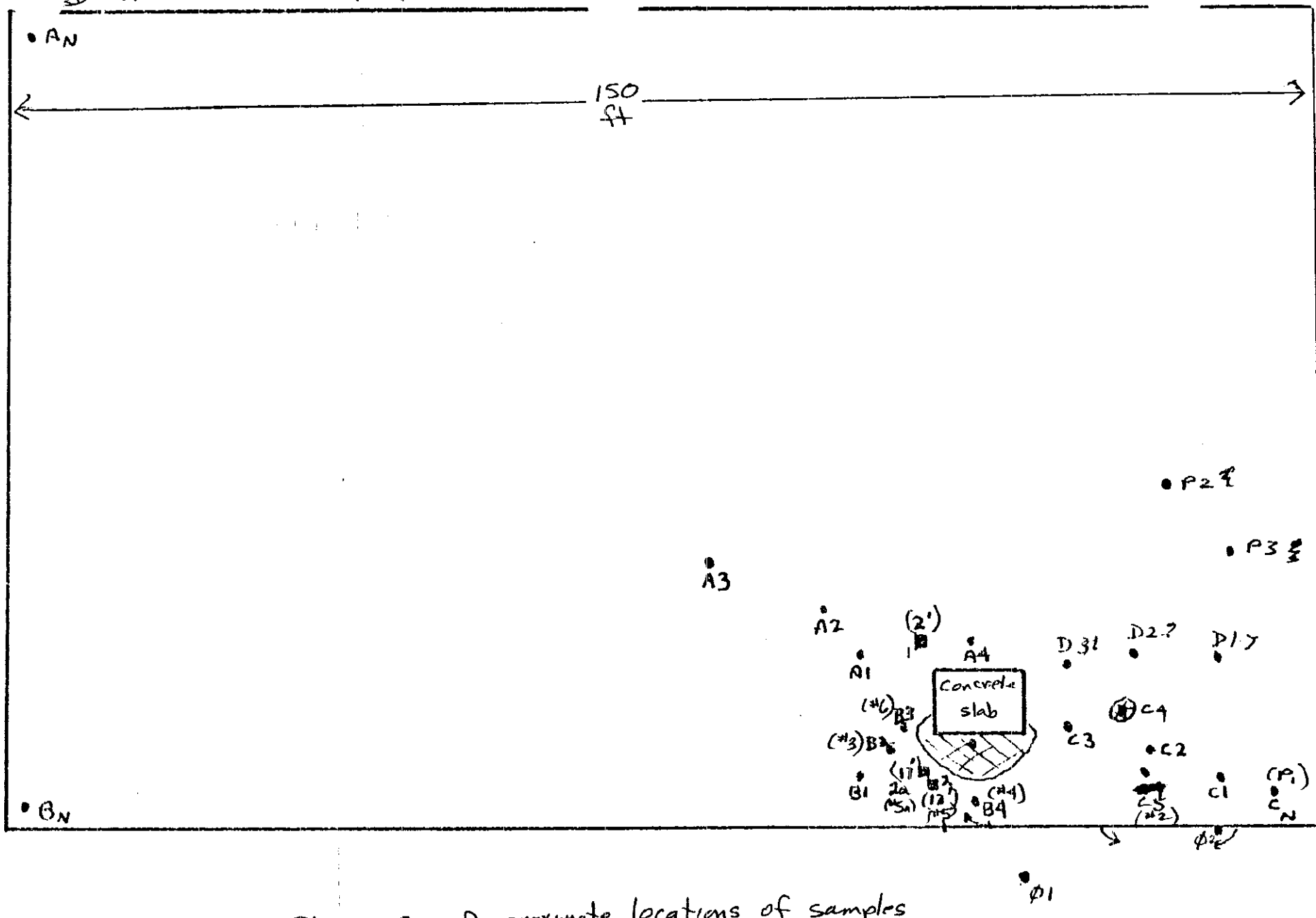
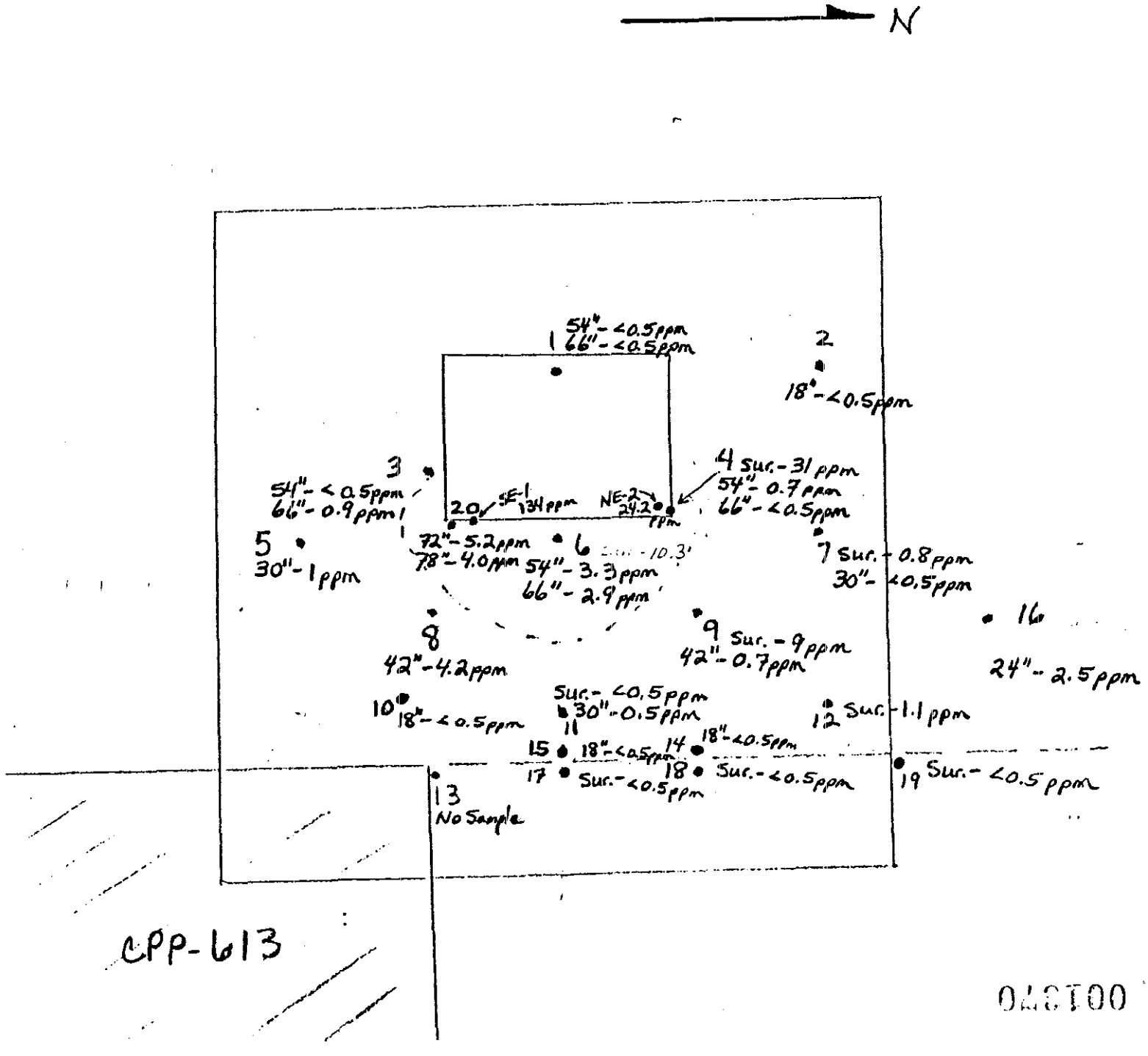


Figure 3.-- Approximate locations of samples taken in and near URGP Substation II.

All Samples



A: Transformer XFR-8T2-2 disconnected and relocated

B: Existing transformer XFR-8T1-3

C: Existing relocated transformer XFR-8T2-1

D: Manhole

⊼: Outdoor circuit breaker

ATTACHMENT #3

00133.0

Scale: 1/2 in. ≅ 10 ft.

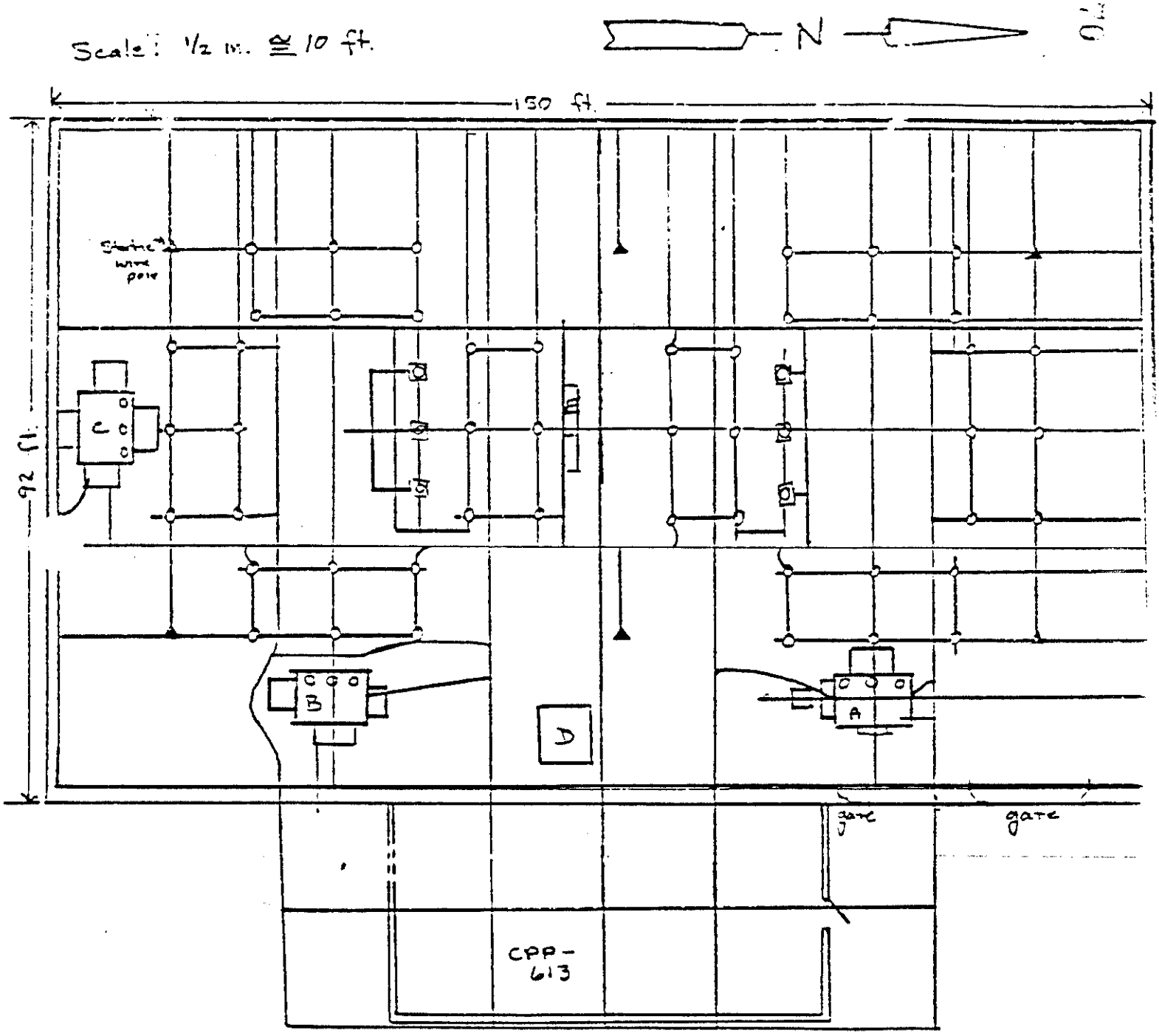
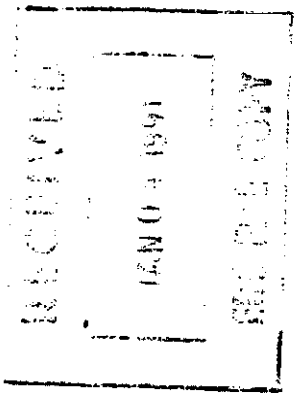


Figure 2.--Grounding Grid at CPP-613, UREP Substation II.

REFERENCE 7

From: S. C. Cooper
Phone: 6-4207
Date: August 8, 1986
Subject: Accomplishments re RCRA and CERCLA

cc: KRK
AJM
TFP
DJP



Hazardous Waste Minimization

A task force was formed to minimize the waste generated at the ICPP. Hazardous waste generated by the ICPP (Idaho Chemical Processing Plant) will be reduced by at least 18,590 gal/yr when the recommendations of the task force are implemented. The initial cost for the changes will be $82,900, and cost savings are expected to be $495,500/yr.

Completion of the Installation Assessment Report

The Installation Assessment Report (CERCLA, Phase I) was completed for the ICPP in May 1986. The assessment includes 38 sites which have been identified as CERCLA/RCRA sites because they are known to have received operational or accidental releases of hazardous, radioactive, or radioactive/hazardous (mixed) wastes.

Completion of Closure Plans

Closure plans for 15 RCRA sites (i.e., sites contaminated with wastes defined as hazardous by RCRA) were written and submitted to DOE and EPA.

EPA RCRA Audit

In April 1986, the ICPP was audited by the EPA. In preparation for this audit, all WINCO departments were sensitized to some of the requirements imposed by RCRA. Several Satellite Staging Areas (SSAs) were set up near hazardous-waste-generating processes. Personnel using the SSAs were trained in SSA requirements and in the use of the Spill Prevention, Control, and Countermeasures (SPCC) Plan.

On the basis of this first EPA audit, no non-compliance items have been cited against the ICPP by the EPA.

Polychlorinated Biphenyl (PCB) Cleanup

A PCB-containing transformer was drained, disconnected, and removed from an EG&G Idaho-owned power substation within the fenced area of the ICPP. The transformer had leaked an estimated 400 gal of transformer fluid containing 179 ppm PCBs.

Using EPA Region X guidelines, all soil containing greater than 10 ppm PCB concentrations was boxed, labeled, and disposed of off site. The concrete transformer pad was removed intact and transported and disposed of off site. All contaminated materials and equipment were either decontaminated or placed in DOT-approved drums, labeled, and shipped off site for disposal.

RA/CERCLA Site Characterization

Construction of a warehouse had been scheduled to be built on an area of the ICPP which was listed as a RCRA site since it had been used for the temporary storage of drums of paint solvents and thinners in the past. Construction was delayed until an outside contractor (the University of Utah) was hired on an expedited basis to characterize the site by sampling and analyzing soil samples using EPA-approved methods. Characterization was successfully completed, and the absence of hazardous materials was confirmed, allowing construction to proceed.

Overflow System for Bulk Storage Tanks

An emergency project to provide containment of bulk liquid chemicals in the event of tank overflows was completed. The project included the installation of catch tanks and the closure and abandonment of several French drains and lime pits.

REFERENCE 8

Westinghouse Idaho Nuclear Company, Inc.

FORM WINCO-5013 (Rev. 3-84)

NOTEGRAM

Date 8/20/85

To Pete Hult Dept. Projects Address CPP-624

From D. Joan Poland Dept. N&IS Address CPP-630

Excess soil from the CPP-718 PCB cleanup can be disposed of or used as clean soil. The laboratory analysis indicates that this soil may contain PCBs but at less than 10 ppm. At less than 10 ppm the soil is not considered a safety or environmental concern. This soil has also been radiologically surveyed and is considered clean.

Please note that you can use the soil to fill in low spots on the north side of CPP-613 as long as you do not create additional drainage problems to the manhole located in the vicinity.

PUT IT IN WRITING - WRITTEN MESSAGES SAVE TIME, PREVENT ANNOYING INTERRUPTIONS AND ERRORS

REFERENCE 9

	A	B	C	L	E	F	G
32	SUMMARY TABLE OF RISK-BASED SOIL SCREENING EQUATIONS						
33	DOCUMENT: DOE/ID-10340(91), JULY 1991						
34	NON-RADIOACTIVE						
35					ORGANIC CONTAMINANTS		
36	AROCHLOR 1260 (PCBS)	OCCUPATIONAL			RESIDENTIAL (a)		
37							99.9
38		Carcinogens		Noncarcinogens	Carcinogens		Noncarcinogens
39		Risk at 1E-06		HQ = 1	Risk at 1E-06		HQ = 1
40		mg/kg (mg/L)		mg/kg (mg/L)	mg/kg		
41							
42	Soil Ingestion	0.74025974		0	0.083116883		0
43	Inhalation of						
44	Fugitive Dust	#DIV/0!		0	#DIV/0!		0
45	Inhalation of						
46	Volatiles	#DIV/0!		0	#DIV/0!		0
47	Groundwater						
48	Ingestion (c)	NA		NA	3.81E+00		0
49	External						
50	Exposure	NA		NA	NA		NA

*No reference doses given in the documentation for inhalation risks for PCBs. Although there is an estimated risk based concentration for groundwater ingestion, use of the GW Screen model will indicate that PCBs will not reach the groundwater prior to 1,000 + years.

Post-It™ brand fax transmittal memo 7671 | # of pages ▸ 1

To Brian Foor	From Carolyn Abbott
Co. WINCO	Co.
Dept.	Phone #
Fax # 526-0665	Fax #

REFERENCE 10

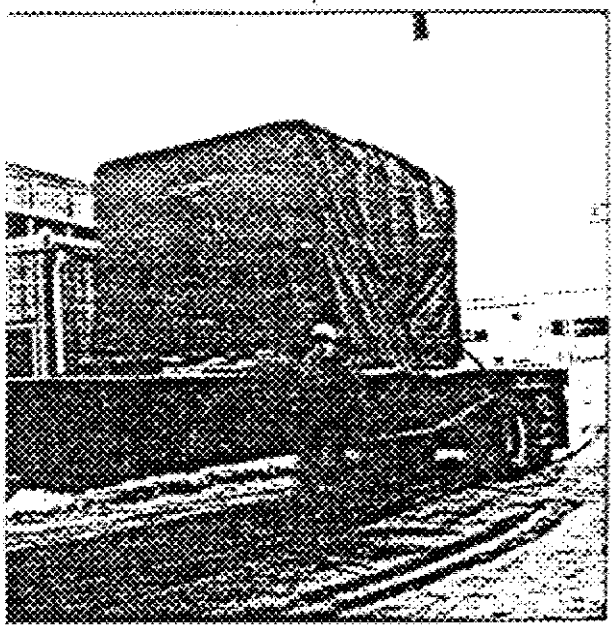
...ds from Shipping & Material Mgt. files (Tom Winden)

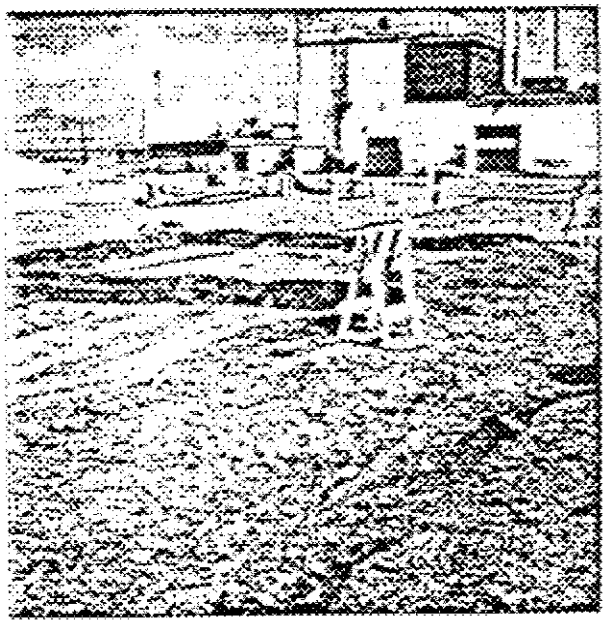
SWMU CPP-61 remediation for PCBs & removal of transformers under Utilities upgrade & expansion project (UREP)

Some of the PCB contaminated material/transformers were stored on plastic in SWMU CPP-51

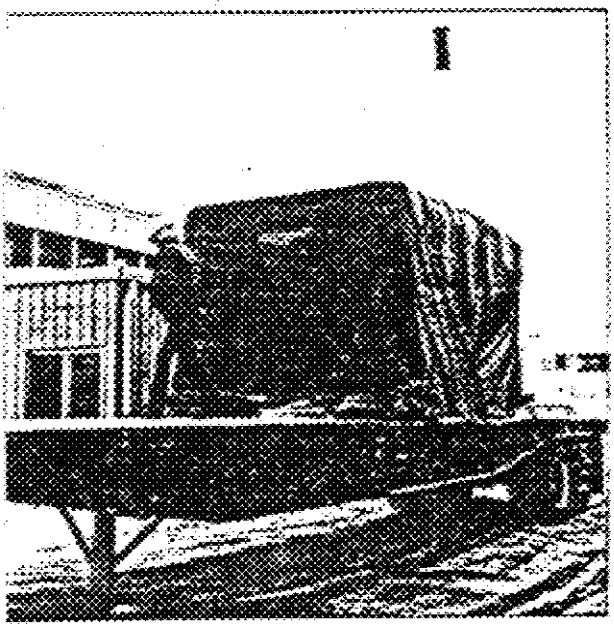
PCP liquid - most can drum (piping from transformer to drum) Some (1-2 gal) ~~spilled~~ spilled to the ground (Asphalt) Most was absorbed, the asphalt was washed with a detergent then dried. the material was wiped up, followed ~~with~~ with additional clean up with "Soap." (per Tom Winden).

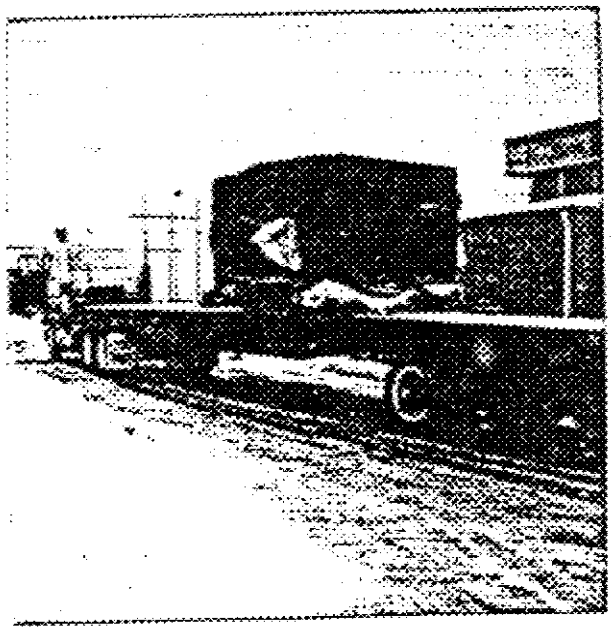
The reason some of the stuff was stored in CPP-51 is contract change from Chem Security (Arlington OR) to USPCI. The change was, in part, do to USPCI's ability to do final destruction of PCB's (~~also~~ also for turn around & OR's restrictions were too difficult to get the work done).

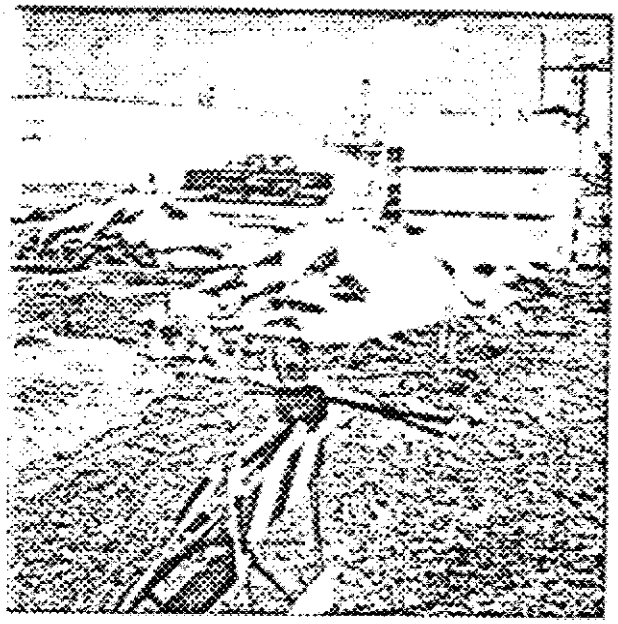




7-24-85







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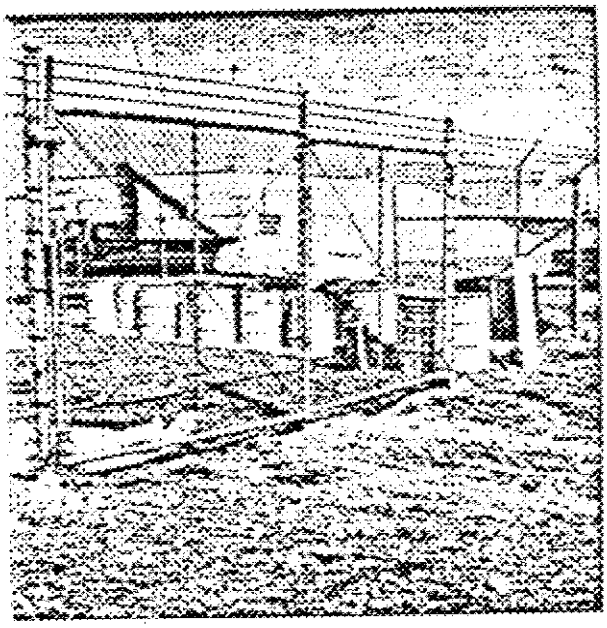

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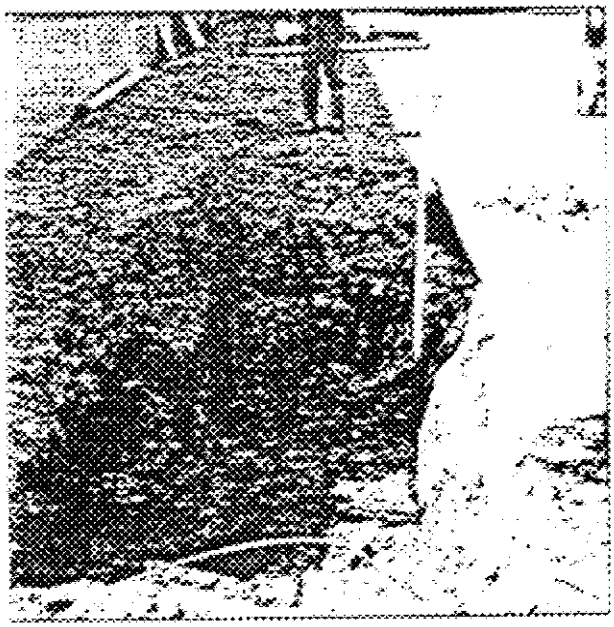

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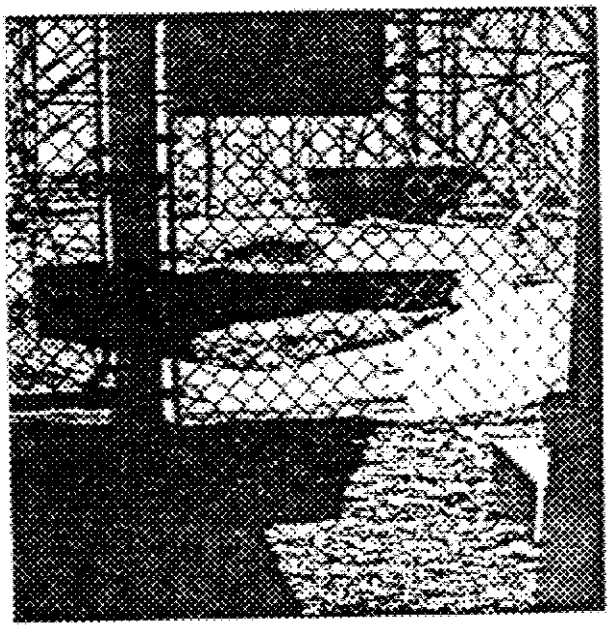

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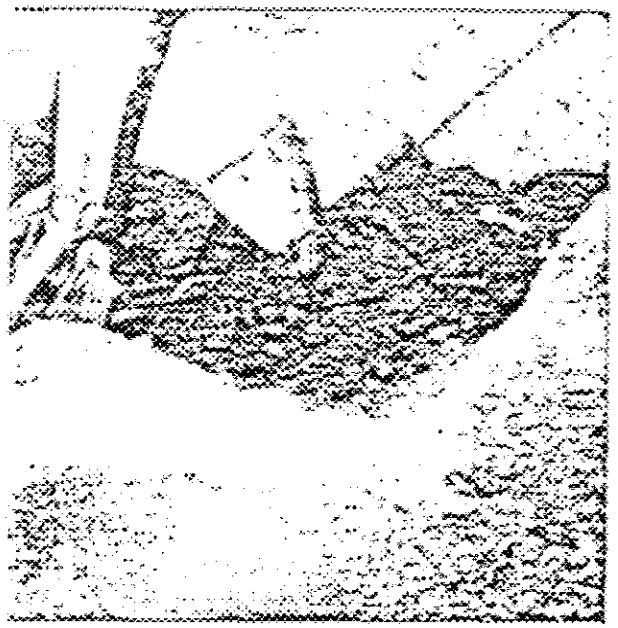

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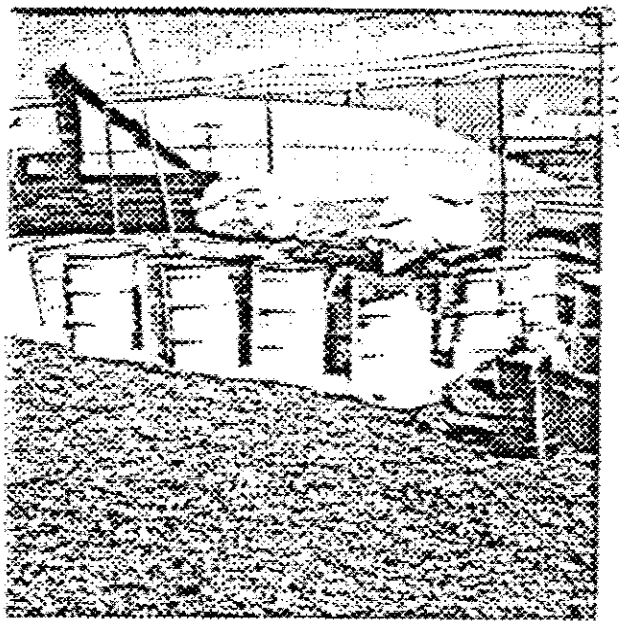

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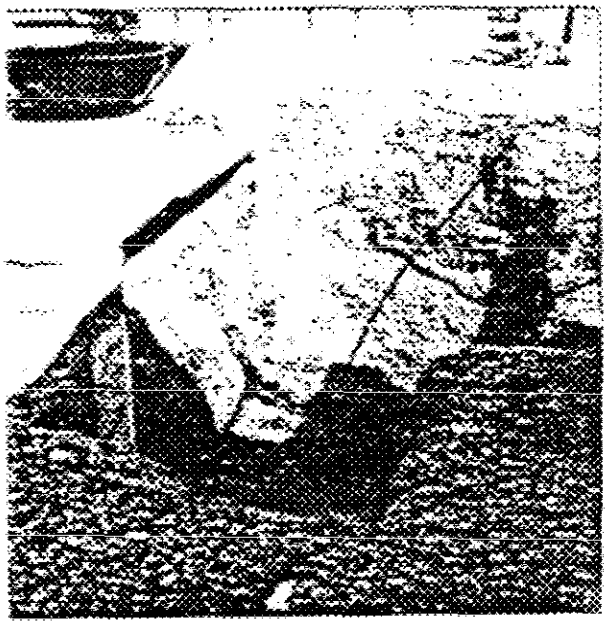
7-24-85



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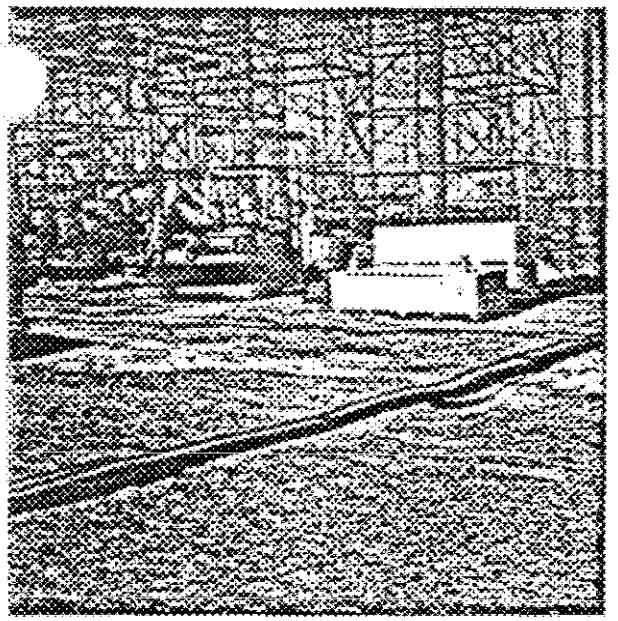
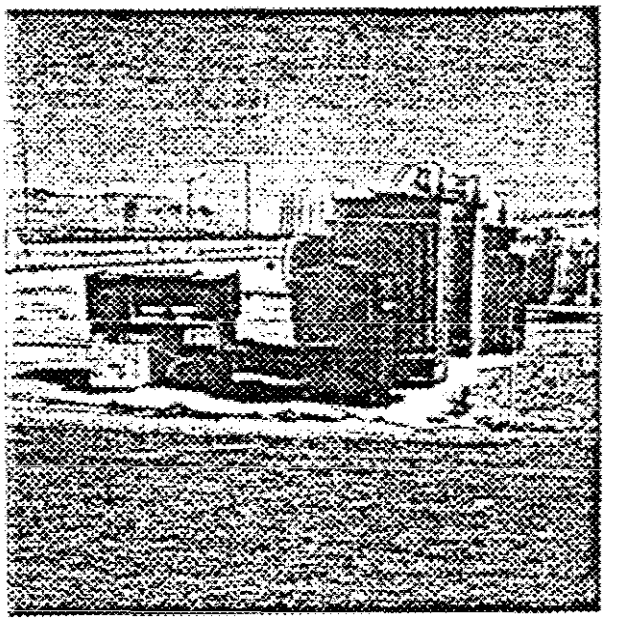


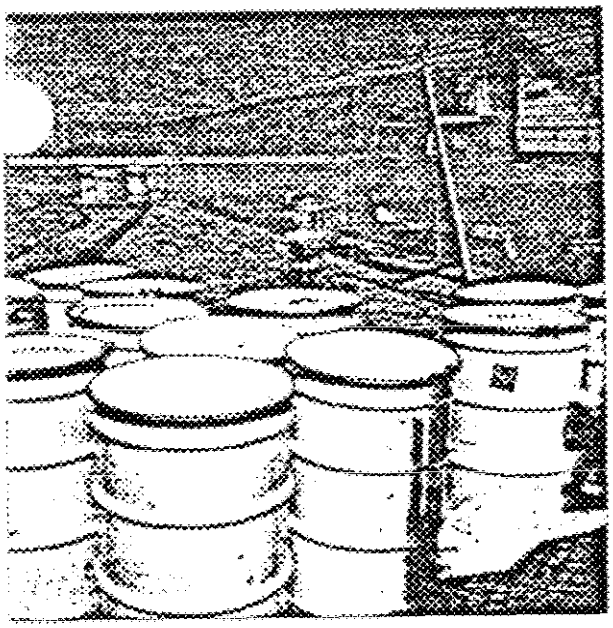
7-19-85 Equipment and storage boxs for Disposal



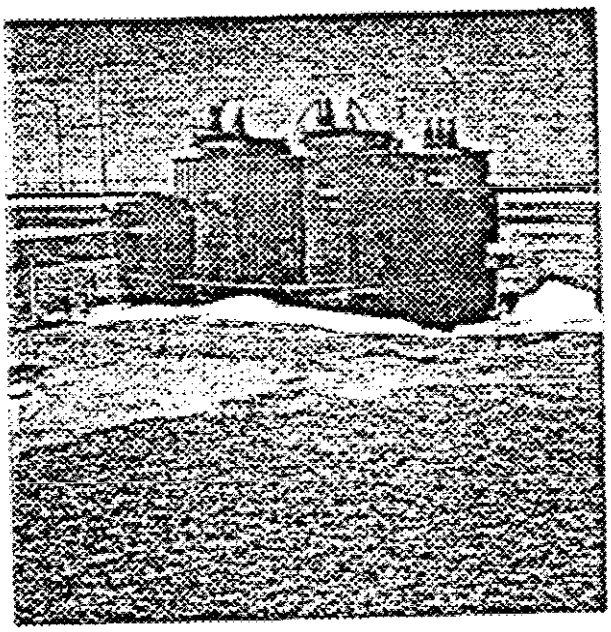
7-19-85 PCB & Equipment From 606 area job

7-19-85 Filling the Drums with PCB & Dirt

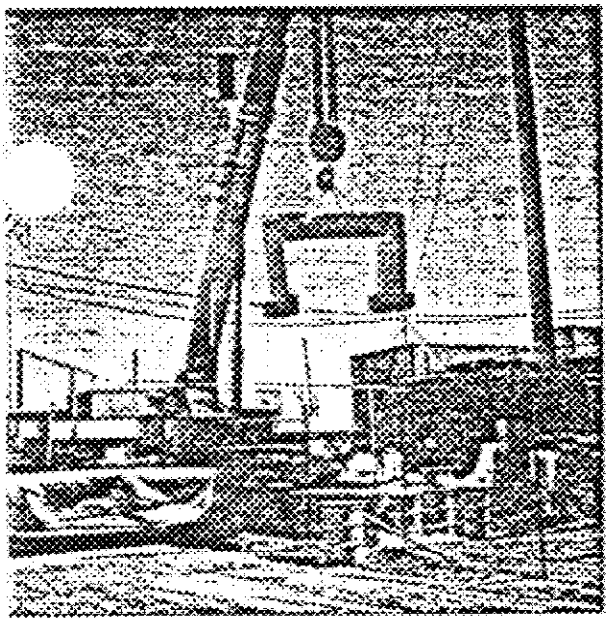
7-19-85 PCB Spill Clean up



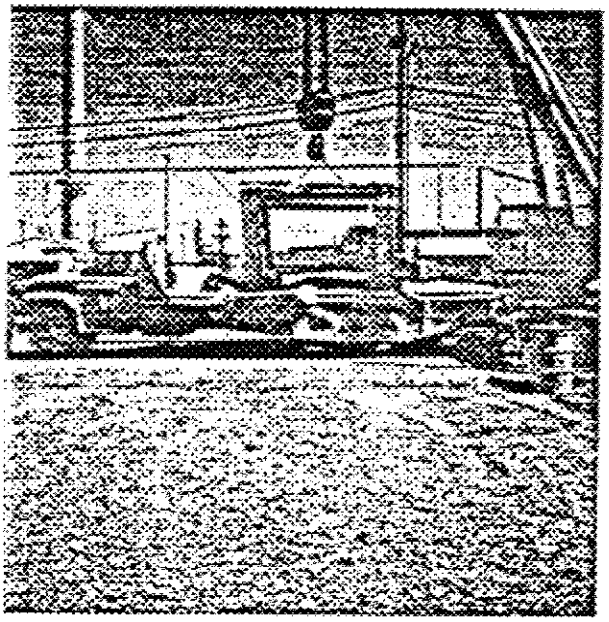
7-19-85
PCB IN 17-E Drums
FOR SHIPMENT



7-19-85 PCBS 606
Equipment from 4Rep 70L



7-25-85 #6



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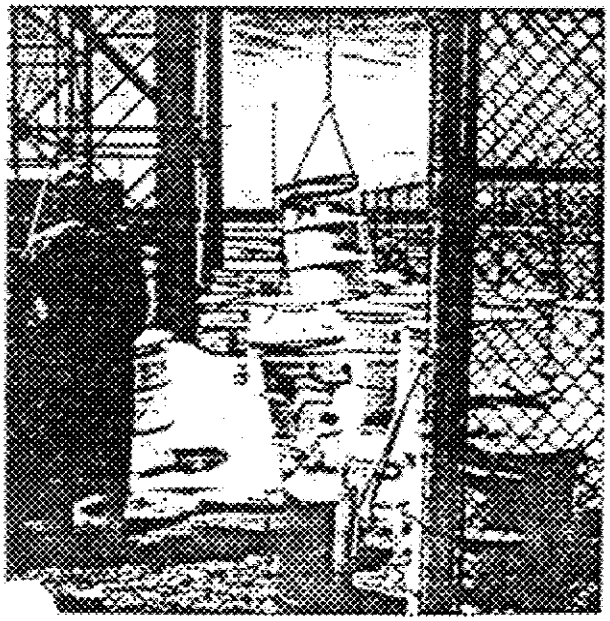
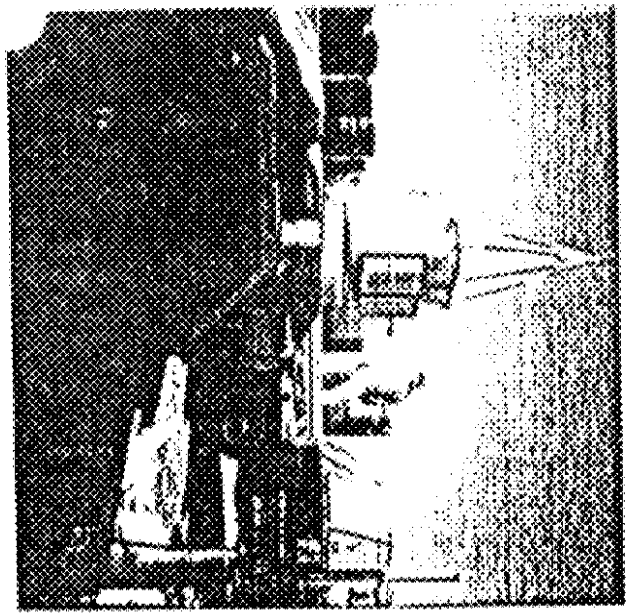
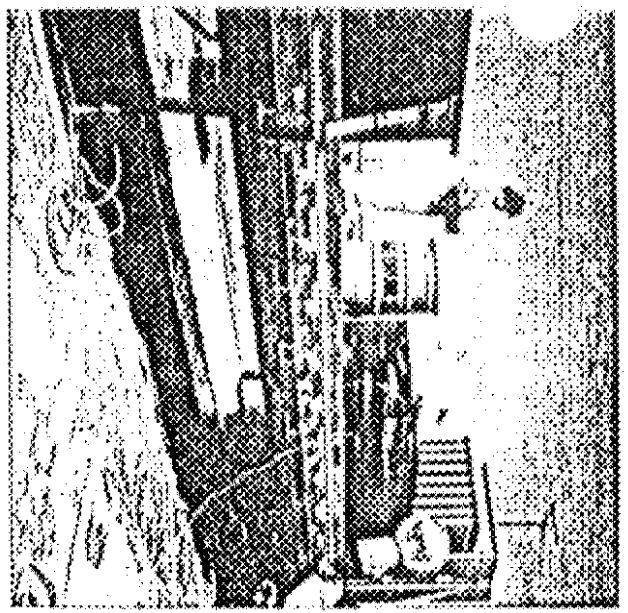
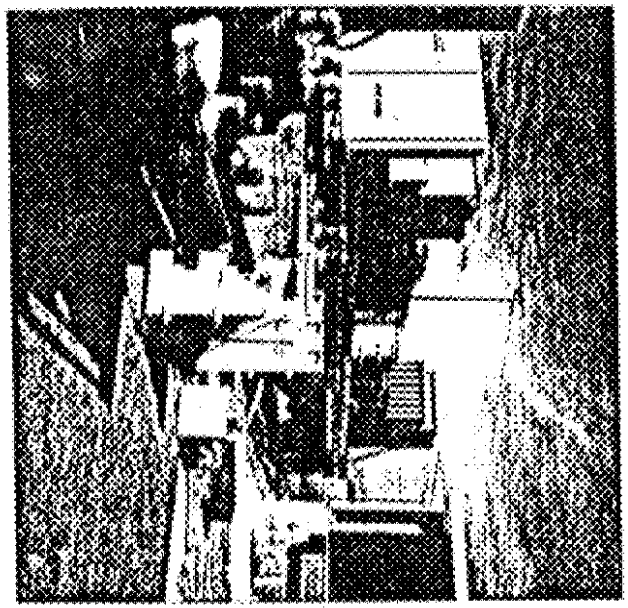


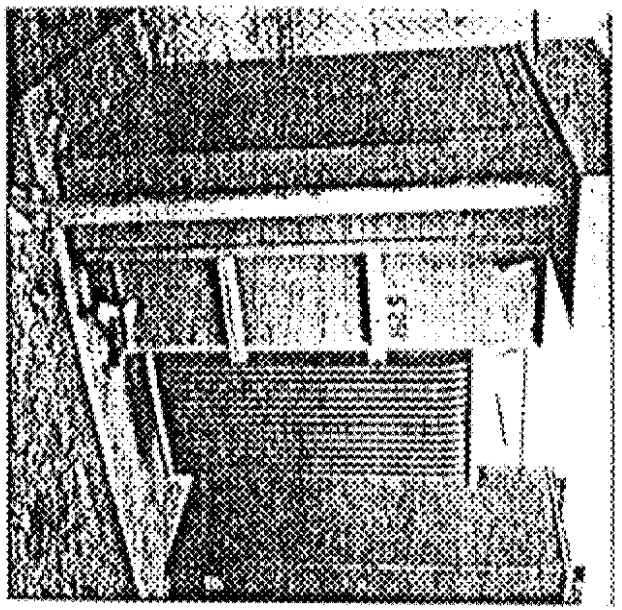
7-31-85

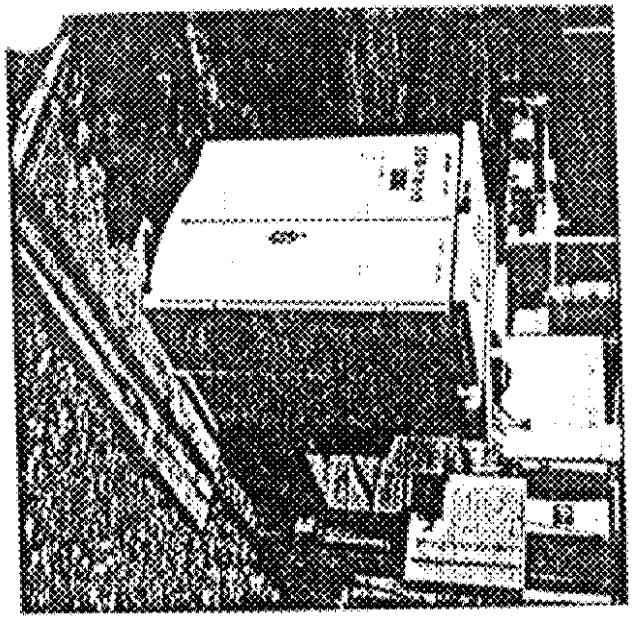
7-31-85

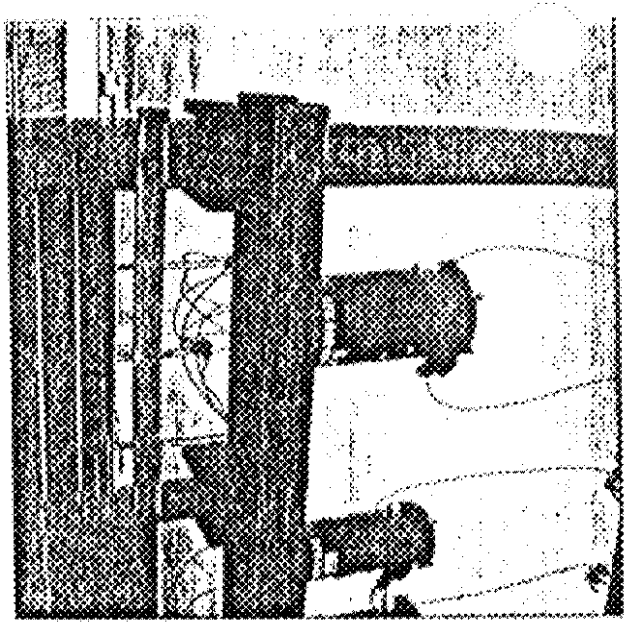


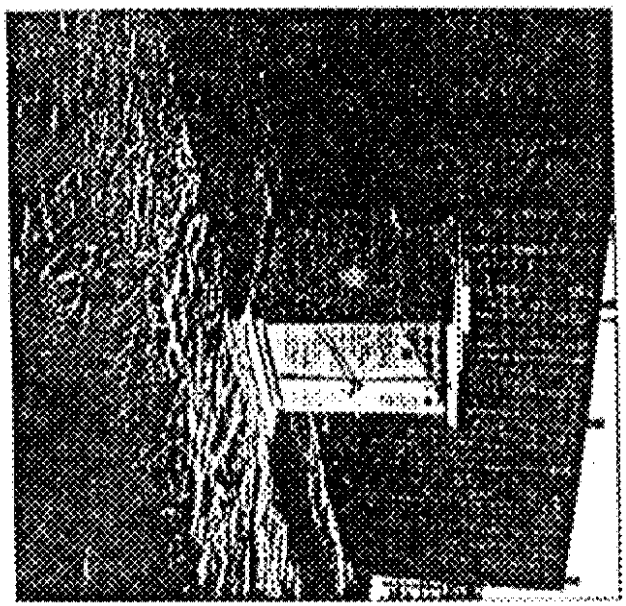


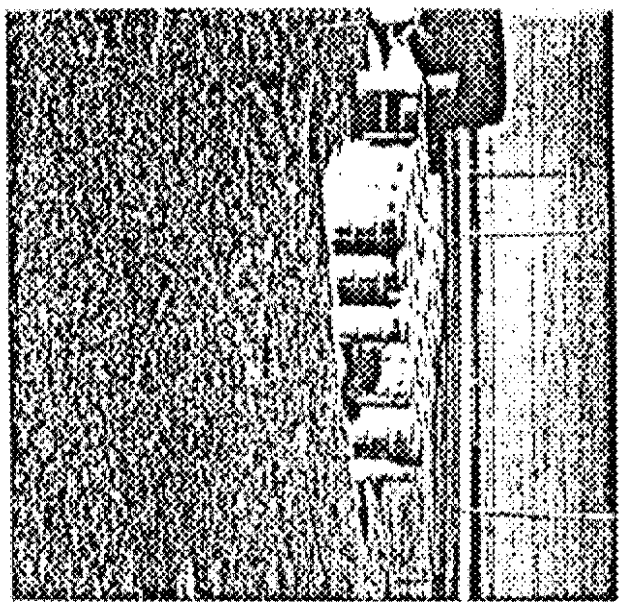


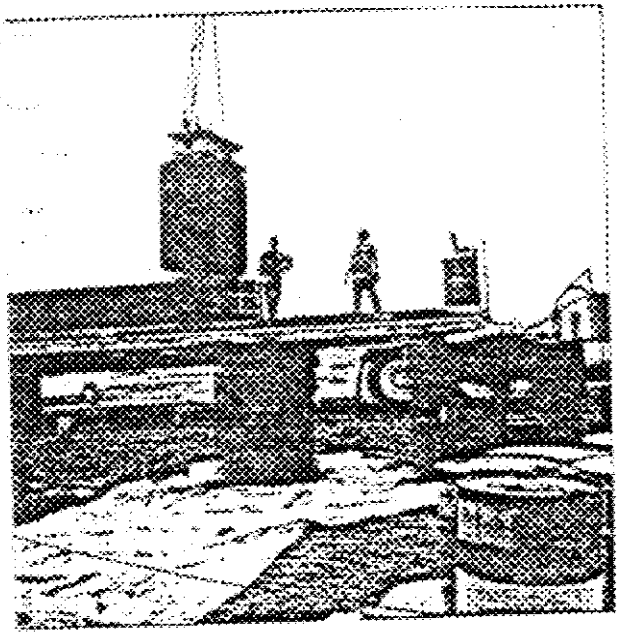


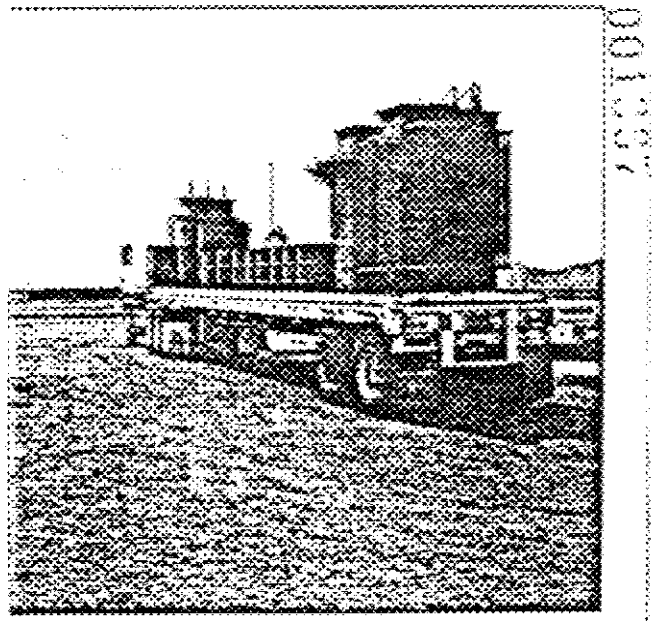




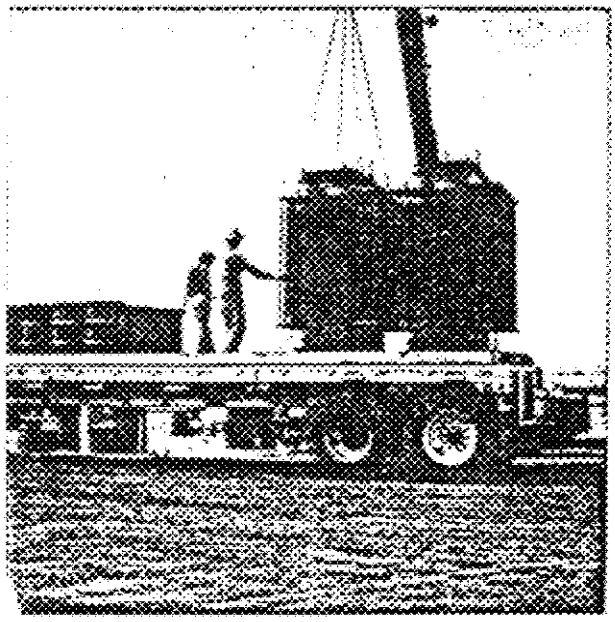


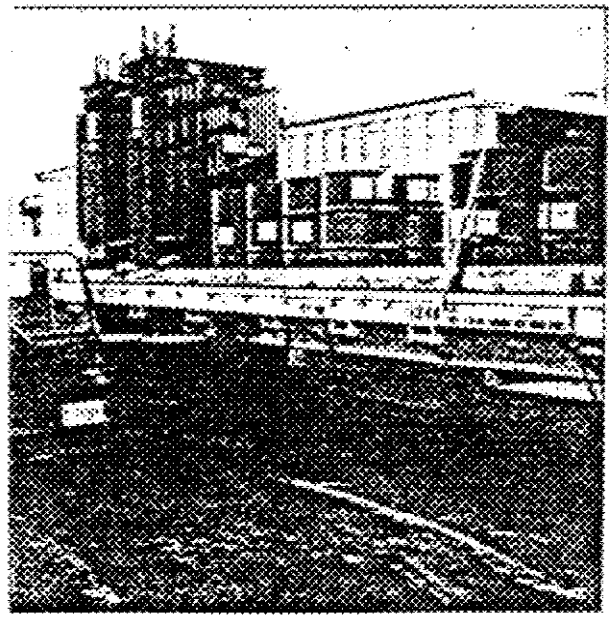




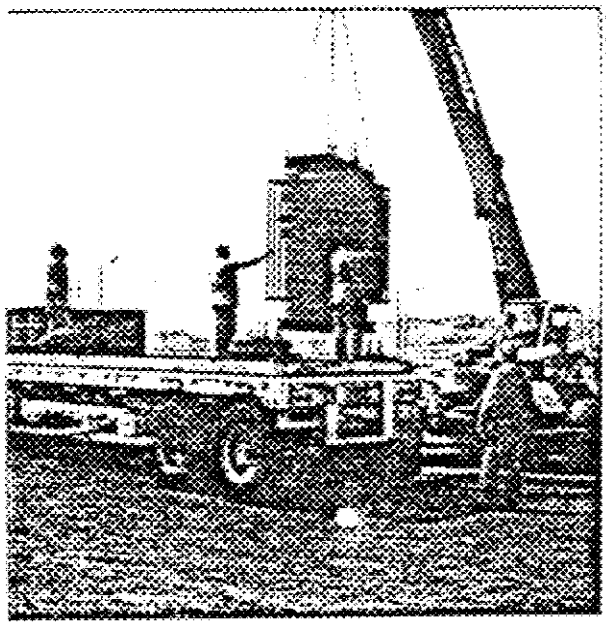


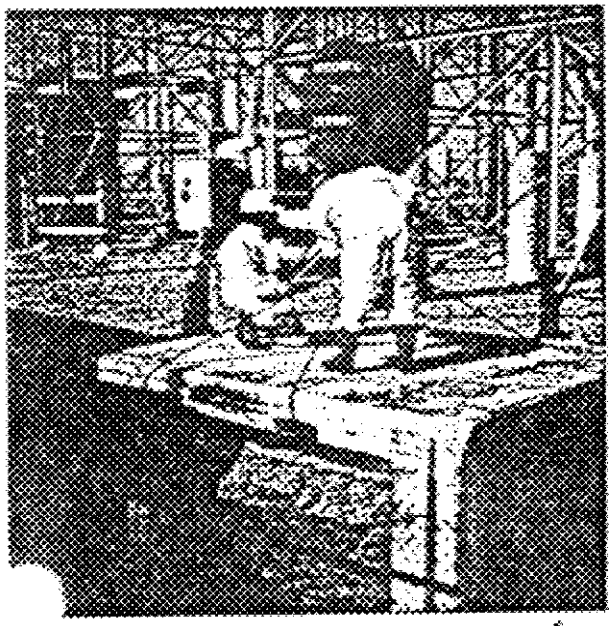
Loading Drum & Transformers
For Shipment





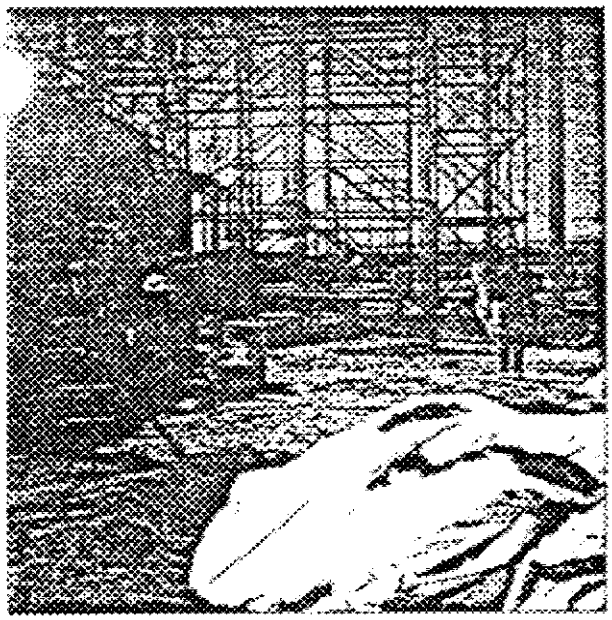
7-25-85 #1





7-25-85 #3

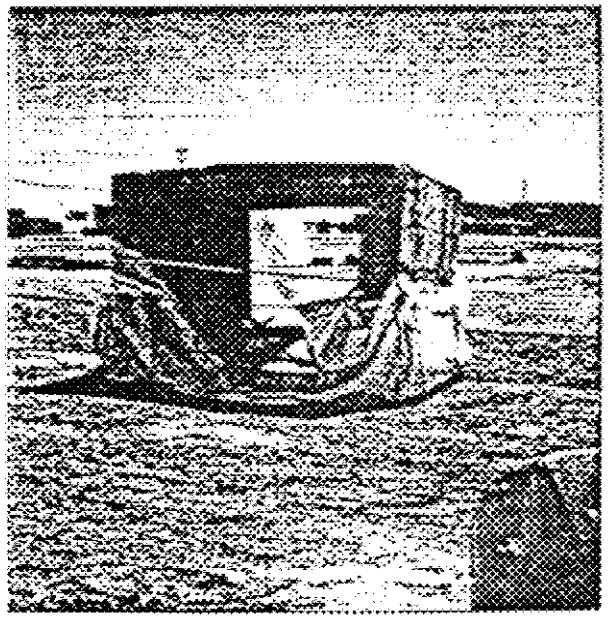
7-25-85 #2



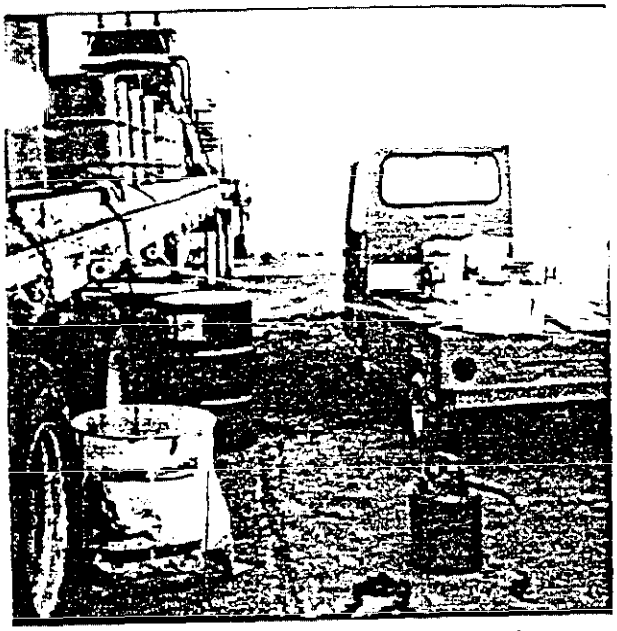
7-25-85 #5

7-25-85 #4

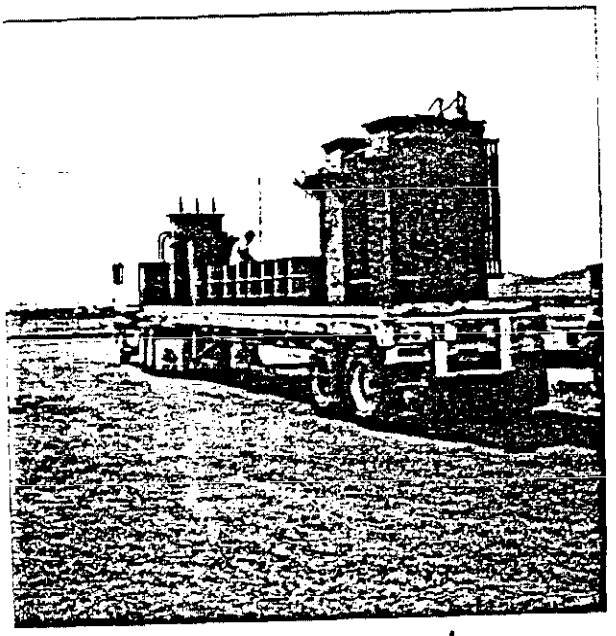
7-29-85
East Pods Removed



7-31-85



PCB Liquid Spill while Transfering Oil To Drums



OLD Transformers Loaded For Shipment To UTAH By US pollution For Disposal

Transfering PCB Oil To 55 gal Drums.

001337